Comment Report

Project Name:	2022-03 Energy Assurance with Energy-Constrained Resources | TOP-0XX-X
Comment Period Start Date:	9/13/2023
Comment Period End Date:	10/5/2023
Associated Ballots:	

There were 29 sets of responses, including comments from approximately 115 different people from approximately 84 companies representing 10 of the Industry Segments as shown in the table on the following pages.

Questions

1. The Energy Reliability Assessment (ERA) definitions are intended to support the Near-Term OPERA which is discussed in this comment period and additional ERAs to be developed by this Standard Drafting Team (SDT). Are the definitions clear and understandable? If not, how would you suggest improving them?

2. Energy Reliability Assessment Temporal Requirements (1): The SDT proposes several temporal parameters for the regular performance of Near-Term Operational Planning Energy Reliability Assessments (OPERA). The first is the requirement that the study begin within 48 hours following the completion of each assessment. The intent is that the first hour of the Near-Term OPERA would not be too far in the future, ensuring the starting point is based upon current information. Is using a starting point of no more than 48 hours in the future appropriate? If not, please comment with alternate language and explanation of recommended changes.

3. Energy Reliability Assessment Temporal Requirements (2): The minimum Study Frequency (how often a Near-Term OPERA is performed) is set to monthly to ensure that results do not become outdated. The Study Frequency is also a function of study duration (how many days/hours the Near-Term OPERA looks at). The requirement for Study Frequency to be less than or equal to the study duration ensures that no period of time is uncovered by a Near-Term OPERA. Is the requirement to perform a Near-Term OPERA no less than monthly, appropriate, or should it be more or less frequent? If more or less frequent, please comment with alternate language.

4. Energy Reliability Assessment: R1.1 and R1.2 are intended to add requirements that outline the elements that should be included in a Near-Term OPERA but allow Balancing Authorities (BA) with different concerns to have flexibility to implement the assessment such that the assessments are useful. Do you agree with the level of specificity in these requirements? If not, would you prefer that the requirements related to this are more or less specific? Additionally, please comment on what requirements should be removed, clarified, or changed.

5. Near-Term OPERA Scenarios: The SDT is proposing to require the development and analysis of scenarios which have a reasonable risk of occurring through the time-horizon of the Near-Term OPERA. Table 1 includes standard scenarios that shall also be evaluated. These scenarios shall have documented criteria which specify when implementing a mitigation Operating Process solution is required. Do you agree with the language in the requirement? If not, please comment with alternate language and explanation of recommended changes.

6. Balancing Authority (BA) Requirements: The proposed Requirements 3, 4 and 5 are modeled after Requirements 2, 3 and 4 in EOP-011-2 to ensure that an individual BA's Near-Term OPERA processes are reviewed by the Reliability Coordinator (RC) based on compatibility and inter-dependency with other BA's Near-Term OPERA processes and scenarios, and have the BA address reliability risks identified by the RC. Do you agree that the requirements for the BA to have its processes reviewed by the RC and any RC-identified issues be addressed by the BA are reasonable?

7. Balancing Authority notifies the RC within 24 hours of identified forecasted Energy Emergencies: Once the Near-Term OPERA has been performed, per the RC reviewed Operating Process, R6 requires the BA to notify its RC within 24 hours of any identified forecasted Energy Emergencies. The 24 hours notification to the RC of all forecasted Energy Emergency provides time for the BA to prepare and respond to the forecasted Energy Emergency. Do you agree that the BA must notify the RC within 24 hours? If not, please comment what would be more appropriate and explain why.

8. Submit the Near-Term OPERA results to the RC upon request: The requirement to submit the results to the RC upon request is intended to ensure the RC can review the assessment results. This requirement ensures the RC can review the results to verify the processes and

scenarios are being implemented and to review any adverse results. Do you agree that the results must be submitted to the RC upon request, for RC review? If not, please comment which would be more accurate and explain why.

9. Operating Process Development: The proposed Requirements 7, 8 and 9 are modeled after Requirements 2, 3 and 4 in EOP-011-2 to ensure that there is a plan developed to respond to deficiencies noted during the performance of a Near-Term OPERA. R7 is intended that Operating Processes would be developed before OPERAs are performed and would be a high-level plan of how a BA would approach a forecasted Energy Emergency, not necessarily a step-by-step process. R7 has required actions listed for consideration that are intended to reduce the risk of Energy Emergencies. As written, the requirement provides a list of optional steps to consider as part of an Operating Process. Should the list of requirements for Operating Processes be optional (as written), be required to be addressed for all BAs (as in EOP-011), or removed from R7 entirely? Please provide additional actions or notes which should not be included in this list as comments.

10. Operating Process Development: The requirement is intended to ensure that there is a plan developed to respond to deficiencies noted during the performance of a Near-Term OPERA. While there are multiple possible types of plans that could be developed (e.g., Operating Plan, Operating Process, Operating Procedure, Corrective Action Plan), the most relevant defined term for responding to a forecasted Energy Emergency is Operating Process. Do you agree with the correct type of plan being an Operating Process? If not, please comment which would be more accurate and explain why.

11. Address Risks Identified in the Review: R8 is intended to provide RCs with information that is needed to ensure that the plans address the reliability of the system. R9 is needed to ensure that any risk identified by the RC in R7 is mitigated by the BA. The SDT proposes that the BA addresses the risk in its Operating Plan and resubmits it to its RC. R10 requires the BA to revise the Operating Process that was previously reviewed by the RC and found to require modifications. Do you agree with the language in the requirements including the proposed timeframes? If not, please provide updated language in your comment as well as a basis for the recommendation.

12. Implementation of Operating Process: R11 is a follow-up from R7, where the BA is now implementing the Operating Process that was previously developed. R12 requires the RC to ensure quick dissemination of critical information to a list of entities which can take appropriate actions to respond to the forecasted Energy Emergency. Does the proposed language clearly outline the responsibilities of the BA and RC in the event of a forecasted Energy Emergency? Is the 24-hour notification window feasible and appropriate for the types of emergency situations that might arise? Please provide any other comments about the language in Requirements 11 and 12.

13. Provide any additional comments for the SDT 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
Independent Electricity System Operator	Harishkumar Subramani Vijay Kumar	2		IRC SRC	Bobbi Welch	Midcontinent ISO, Inc.	2	MRO
					Gregory Campoli	New York Independent System Operator	2	NPCC
					John Pearson	ISO New England, Inc.	2	NPCC
					Elizabeth Davis	PJM	2	MRO
					Kennedy Meier	Electric Reliability Council of Texas, Inc.	2	Texas RE
					Charles Yeung	SPP	2	MRO
					Ali Miremadi	CAISO	2	WECC
Tacoma Public Utilities (Tacoma, WA)	Jennie Wike	1,3,4,5,6	WECC	Tacoma Power	Jennie Wike	Tacoma Public Utilities	1,3,4,5,6	WECC
					John Merrell	Tacoma Public Utilities (Tacoma, WA)	1	WECC
					John Nierenberg	Tacoma Public Utilities (Tacoma, WA)	3	WECC
					Hien Ho	Tacoma Public Utilities (Tacoma, WA)	4	WECC
					Terry Gifford	Tacoma Public Utilities (Tacoma, WA)	6	WECC

					Ozan Ferrin	Tacoma Public Utilities (Tacoma, WA)	5	WECC
ACES Power Marketing	Jodirah Green	1,3,4,5,6	MRO,RF,SERC,Texas RE,WECC	ACES Collaborators	Bob Soloman	Hoosier Energy Electric Cooperative	1	RF
					Kris Carper	Arizona Electric Power Cooperative, Inc.	1	WECC
					Jasmine Morris	Southern Maryland Electric Cooperative	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
					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

					Shonda McCain	Omaha Public Power District	6	MRO
					George Brown	Acciona Energy North America	5	MRO
					Jaimin Patel	Saskatchewan Power Corporation	1	MRO
					Kimberly Bentley	Western Area Power Administration	1,6	MRO
					Jay Sethi	Manitoba Hydro	1,3,5,6	MRO
					Michael Ayotte	ITC Holdings	1	MRO
Southern Company - Southern Company Generation	Leslie Burke	5,6		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
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	NPCC RSC	Gerry Dunbar	Northeast Power Coordinating Council	10	NPCC
					Alain Mukama	Hydro One Networks, Inc.	1	NPCC
					Deidre Altobell	Con Edison	1	NPCC
					Jeffrey Streifling	NB Power Corporation	1	NPCC
					Michele Tondalo	United Illuminating Co.	1	NPCC
					Stephanie Ullah-Mazzuca	Orange and Rockland	1	NPCC
					Michael Ridolfino	Central Hudson Gas & Electric Corp.	1	NPCC

Randy Buswell	Vermont Electric Power Company	1	NPCC
James Grant	NYISO	2	NPCC
John Pearson	ISO New England, Inc.	2	NPCC
Harishkumar Subramani Vijay Kumar	Independent Electricity System Operator	2	NPCC
Randy MacDonald	New Brunswick Power Corporation	2	NPCC
Dermot Smyth	Con Ed - Consolidated Edison Co. of New York	1	NPCC
David Burke	Orange and Rockland	3	NPCC
Peter Yost	Con Ed - Consolidated Edison Co. of New York	3	NPCC
Salvatore Spagnolo	New York Power Authority	1	NPCC
Sean Bodkin	Dominion - Dominion Resources, Inc.	6	NPCC
David Kwan	Ontario Power Generation	4	NPCC
Silvia Mitchell	NextEra Energy - Florida Power and Light Co.	1	NPCC
Glen Smith	Entergy Services	4	NPCC
Sean Cavote	PSEG	4	NPCC
Jason Chandler	Con Edison	5	NPCC
Tracy MacNicoll	Utility Services	5	NPCC
Shivaz Chopra	New York Power Authority	6	NPCC

					Vijay Puran	New York State Department of Public Service	6	NPCC
					ALAN ADAMSON	New York State Reliability Council	10	NPCC
					David Kiguel	Independent	7	NPCC
					Joel Charlebois	AESI	7	NPCC
					Joshua London	Eversource Energy	1	NPCC
Western Electricity Coordinating Council	Steven Rueckert	10		WECC	Steve Rueckert	WECC	10	WECC
					Phil O'Donnell	WECC	10	WECC
Sacramento Municipal Utility District	Tim Kelley	1,3,4,5,6	WECC	SMUD	Ryder Couch	Sacramento Municipal Utility District	5	WECC
					Foung Mua	Sacramento Municipal Utility District	4	WECC
					Wei Shao	Sacramento Municipal Utility District	1	WECC
					Nicole Looney	Sacramento Municipal Utility District	3	WECC
					Charles Norton	Sacramento Municipal Utility District	6	WECC
Associated Electric Cooperative, Inc.	Todd Bennett	1,3,5,6		AECI	Michael Bax	Central Electric Power Cooperative (Missouri)	1	SERC
					Adam Weber	Central Electric Power Cooperative (Missouri)	3	SERC
					Stephen Pogue	M and A Electric Power Cooperative	3	SERC
					William Price	M and A Electric Power Cooperative	1	SERC

					Peter Dawson	Sho-Me Power Electric Cooperative	1	SERC
					Mark Ramsey	N.W. Electric Power Cooperative, Inc.	1	NPCC
					John Stickley	NW Electric Power Cooperative, Inc.	3	SERC
					Tony Gott	KAMO Electric Cooperative	3	SERC
					Micah Breedlove	KAMO Electric Cooperative	1	SERC
					Kevin White	Northeast Missouri Electric Power Cooperative	1	SERC
					Skyler Wiegmann	Northeast Missouri Electric Power Cooperative	3	SERC
					Ryan Ziegler	Associated Electric Cooperative, Inc.	1	SERC
					Brian Ackermann	Associated Electric Cooperative, Inc.	6	SERC
					Brad Haralson	Associated Electric Cooperative, Inc.	5	SERC

1. The Energy Reliability Assessment (ERA) definitions are intended to support the Near-Term OPERA which is discussed in this comment period and additional ERAs to be developed by this Standard Drafting Team (SDT). Are the definitions clear and understandable? If not, how would you suggest improving them?

Hillary Creurer - Allete - Minnesota Power, Inc. - 1

Answer	No
Document Name	

Comment

Minnesota Power supports EEI's comments.

Likes 0	
Dislikes 0	

Response

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

Answer	No
Document Name	

Comment

ERA:

Suggest the following for the first sentence of ERA to reflect the current BES definition and pending IBR registration criteria:

*Evaluation of the resources that supply electrical energy and ancillary services for the **BES and NERC registered generation** to reliably meet the expected demand during the associated time period.*

Suggest the following for the last sentence of ERA:

ERAs account for the impact of actions that occur in each time interval on all subsequent time intervals, including unavailability, or depletion and replenishment of finite upstream resources (e.g., fuel, hydro reservoirs, batteries, and wind, among others).

Study Period: Unclear what lead time has to do with it. The study period is simply the future time period that is being studied or assessed. In addition, although this term is used several times in the standard, it is never capitalized.

Study Frequency: The time period between when Energy Reliability Assessments are performed could be confused to mean the time between the end of one and the start of the next. Better to say it is how often an assessment is carried out, e.g. every seven days on a Friday, every 14 days on a Friday, every month on the first Friday, etc.

Recommend the SDT provide a timeline example in the Technical Rationale.

Likes 0	

Dislikes 0	
Response	
Jennie Wike - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6 - WECC, Group Name Tacoma Power	
Answer	No
Document Name	
Comment	
Tacoma Power endorses MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	No
Document Name	
Comment	
BPA does not believe definitions are needed for Study Period, Study Frequency or Study Temporal Resolution. BPA suggests that if an hourly study is required, use the term ‘hourly’ rather than ‘temporal’.	
Likes 0	
Dislikes 0	
Response	
Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF	
Answer	No
Document Name	
Comment	
-Please consider whether “BES” should be used instead of BPS for the term Energy Reliability Assessment (ERA).	

-Add “Near-Term” in the Near-Term Operational Planning Energy Reliability Assessment acronym (OPERA) to avoid confusion when seasonal OPERA is implemented.

-Change Study Temporal Resolution to “Study Temporal Granularity”. Use of the word resolution implies a CAP.

Likes 0	
Dislikes 0	

Response

Nikki Carson-Marquis - Minnkota Power Cooperative Inc. - 1 - MRO

Answer	No
Document Name	

Comment

Minnkota Power Cooperative supports comments by the MRO New Standards Review Forum (MRO NSRF) and ACES.

Likes 0	
Dislikes 0	

Response

Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO

Answer	No
Document Name	

Comment

It is not clear for the definition of ERA: does the assessment need to perform every day to cover no more than six weeks or just once in a certain number of days. Please provide examples to clarify the timelines mentioned in R1. MH also supports MRO NSRF’s vote and comments for this one.

Likes 0	
Dislikes 0	

Response

Jason Snodgrass - Georgia System Operations Corporation - 3 - SERC

Answer	No
Document Name	

Comment

Aside from the definition of an Energy Reliability Assessment, GSOC does not believe that the proposed definitions are either clear or necessary. Moreover, they do not provide regional flexibility that would likely be necessary to provide meaningful results.

Likes 0	
Dislikes 0	

Response

Leslie Burke - Southern Company - Southern Company Generation - 5,6, Group Name Southern Company

Answer	No
Document Name	

Comment

Southern Company supports the EEI comments and does **not** believe that the proposed definitions are necessary or add reliability benefits.

Likes 0	
Dislikes 0	

Response

Keith Jonassen - ISO New England, Inc. - 2 - NPCC

Answer	No
Document Name	

Comment

Suggested Revision to remove six weeks in the Near Term OPERA definition:

Near-Term Operational Planning Energy Reliability Assessment (OPERA): An Energy Reliability Assessment (ERA) performed for a short period of time, starting in the current operating day or next day, to be defined by the entity performing the study based on regionally specific requirements.

Likes 0	
Dislikes 0	

Response

David Jendras Sr - Ameren - Ameren Services - 1,3,6

Answer	No
Document Name	

Comment

Ameren agrees with and supports MISO's comments.

Likes 0	
Dislikes 0	

Response

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

Answer	No
Document Name	

Comment

With the exception of the proposed definition of “Energy Reliability Assessment” (ERA), EEI does not agree that the proposed definitions are necessary or add reliability benefits. The current time frames identified in the NERC Glossary of Terms and in the existing NERC Reliability Standards (see examples below) provide a sufficient framework to adequately describe the desired time periods associated with the proposed ERA. Those existing timeframes, coupled with the existing definitions in NERC’s Glossary of Terms for Operating Process, Operating Plan and Operating Procedures should provide adequate guidance without introducing additional terms that may be unnecessary or unduly prescriptive and thereby could possibly limit needed regional flexibility. For these reasons, the definitions for “Near Term OPERA”, “Study Period”, “Study Frequency”, and “Study Temporal Resolution” should be deleted. However, we do see value in the proposed definition of “Energy Reliability Assessment” but offer the following proposed changes in boldface below:

ERA Definition: Evaluation of the resources that supply electrical energy and ancillary services for the **BES and NERC registered generation** to reliably meet the expected demand during the associated time period. ERAs account for **attribution of these resources which can change over time in the relevant study period (e.g., the depletion and replenishment of fuel and impacts of energy storage devices, including capacity depletion and recharging impacts).**

Example Standards and Glossary References

IRO-017-1

From “Section F” and “Guideline and Technical Basis” –

The official definition of the **Operations Planning Time Horizon** is: “operating and resource plans from **day-ahead up to and including seasonal**.” The SDT equates ’seasonal’ as being up to one year out and that these requirements cover the period from **day-ahead to one year out**. (See IROL-017-1 Technical Rationale, Rationale for Time Horizon, page 7)

TOP-002-5 –

R4—

Each Balancing Authority shall have an **Operating Plan(s) for the next day** that addresses: *[Violation Risk Factor: Medium] [**Time Horizon: Operations Planning**]*

EOP-011-4 –

R2—

Each Balancing Authority shall develop, maintain, and implement one or more Reliability Coordinator-reviewed **Operating Plan(s)** to mitigate Capacity Emergencies and Energy Emergencies within its Balancing Authority Area. The Operating Plan(s) shall include the following, as applicable: *[Violation Risk Factor: High] [**Time Horizon: Real-Time Operations, Operations Planning,** Long-term Planning**]***

R8—

Each Balancing Authority shall have an extreme cold weather **Operating Process** as part of its **Operating Plan** developed in Requirement R4 for its Balancing Authority Area, addressing preparations for and operations during extreme cold weather periods. The extreme cold weather **Operating Process** shall include, but is not limited to: *[Violation Risk Factor: Medium] [**Time Horizon: Operations Planning**]*

NERC Glossary of Terms –

Real Time & Real Time Assessment

Operational Planning Analysis (Next Day)

Likes 0	
Dislikes 0	

Response

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

Answer	No
Document Name	

Comment

BC Hydro appreciates the opportunity to review and offers the following.

The ERA definition can benefit from additional clarity, as the current draft could be interpreted that the “resources” themselves are evaluated (e.g. what resource types are best). BC Hydro believes it should be on whether we have enough of our existing resources.

Recommend revising the ERA definition to focus on an evaluation of whether the supply is sufficient for demand, and then expand upon what is “supply” and “demand”. Also, if terms already defined in the Glossary such as “demand” are intended to be used, these should be capitalized; alternatively, suggest using different wording to alleviate possible confusion.

Also, in the ERA definition it is not clear what is meant by “impact of actions that occur in each iteration on all subsequent iterations”. Please clarify.

In the Near-Term OPERA definition, does the “short period of time” wording pertain to the time to carry out the ERA or the time period for which an ERA is performed. Also, the Near-Term OPERA uses the term “study” – it is unclear what is meant by study (is it the ERA or any study)

The Study Period definition appears to imply that Study Period is the time needed to carry out the assessment. Please confirm whether this is the intended interpretation.

Likes 0	
Dislikes 0	

Response

Harishkumar Subramani Vijay Kumar - Independent Electricity System Operator - 2, Group Name IRC SRC	
Answer	No
Document Name	
Comment	
Comments: The ISO/RTO Council (IRC) Standards Review Committee (SRC) suggests the following to improve the clarity of the proposed definitions: • ERA: Add the following for the last sentence: “ERAs account for the impact of actions that occur in each time interval on all subsequent time intervals, including unavailability, or depletion and replenishment of finite upstream resources (e.g., fuel, hydro reservoirs, batteries, and wind, among others)”. • Study Period: It is not clear what lead time has to do with the study period. In addition, “study period” is never capitalized when it is used in the standard. The SRC recommends that the term be capitalized when used. • Study Frequency: The phrase “The time period between when ERAs are performed” could be confused to mean the time between the end of one ERA and the start of the next ERA. We suggest it clarifying this definition to indicate that it refers to the frequency with which an assessment is carried out, e.g. every seven days on a Friday, every 14 days on a Friday, every month on the first Friday, etc. The ISO/RTO Council (IRC) Standards Review Committee (SRC) suggests the following to improve the clarity of the proposed definitions: • ERA: Add the following for the last sentence: “ERAs account for the impact of actions that occur in each time interval on all subsequent time intervals, including unavailability, or depletion and replenishment of finite upstream resources (e.g., fuel, hydro reservoirs, batteries, and wind, among others)”. • Study Period: It is not clear what lead time has to do with the study period. In addition, “study period” is never capitalized when it is used in the standard. The SRC recommends that the term be capitalized when used. • Study Frequency: The phrase “The time period between when ERAs are performed” could be confused to mean the time between the end of one ERA and the start of the next ERA. We suggest it clarifying this definition to indicate that it refers to the frequency with which an assessment is carried out, e.g. every seven days on a Friday, every 14 days on a Friday, every month on the first Friday, etc.	
Likes 0	
Dislikes 0	
Response	
Lindsay Wickizer - Berkshire Hathaway - PacifiCorp - 6	
Answer	No
Document Name	
Comment	
In general, PAC supports some of the comments submitted by the MRO. TOP-0XX-X is a very complicated and broad standard to be able to comment on with so little time for RC, area and entity interactions discussions. PAC believes that as written, TOP-0XX-X is too prescriptive and too duplicative of current standard requirements to make specific comments at this time. The drafting team needs to address the duplicative activities and allow time for more RC and regional discussions.	
Likes 0	
Dislikes 0	
Response	
Casey Perry - PNM Resources - 1,3 - WECC,Texas RE	
Answer	No

Document Name	
Comment	
PNM Resourcess aggrees with EEI that the terms as “Study Period”, Study Frequency” or “Study Temporal Resolution” do not need to be defined as a NERC Glossary Term. For purposes of a NERC Reliability Standard, study periods, study frequency and study resolution/degree of detail should be clearly defined in the language of the Reliability Standard.	
Likes 0	
Dislikes 0	
Response	
Marcus Bortman - APS - Arizona Public Service Co. - 1,3,5,6	
Answer	No
Document Name	
Comment	
AZPS does not agree that the definitions are clear and understandable. AZPS believes these new definitions, outside of the Energy Reliability Assessment (ERA) definition itself, are not necessary to describe an ERA and do not provide the regional flexibility necessary to produce a meaningful assessment.	
Likes 0	
Dislikes 0	
Response	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	No
Document Name	
Comment	
ERCOT joins the comments submitted by the ISO/RTO Council (IRC) Standards Review Committee (SRC) and adopts them as its own.	
Likes 0	
Dislikes 0	
Response	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators	
Answer	No

Document Name	
Comment	
The ERA definition uses the acronym “BPS”, yet this acronym is not defined. We assume it to stand for the NERC defined term “Bulk Power System”; however, we recommend spelling it out for clarity.	
Likes 0	
Dislikes 0	
Response	
Alan Kloster - Evergy - 1,3,5,6 - MRO	
Answer	No
Document Name	
Comment	
Evergy supports and incorporates by reference the comments of the Edison Electric Institute for questions #1. In addition, Evergy believes that the EEI suggested edits to this draft would make the standard requirements flexible enough to cover both near-term and seasonal operational planning assessments effectively. Given that the drafting team has planned to draft separate language related to seasonal operational assessments, Evergy recommends the drafting team assess to what extent these proposed edits could meet that goal as well.	
Likes 0	
Dislikes 0	
Response	
Tim Kelley - Sacramento Municipal Utility District - 1,3,4,5,6 - WECC, Group Name SMUD	
Answer	No
Document Name	
Comment	
The term should be changed to "Resource Reliability Assessment" as BAs assess not only available energy but also available capacity.	
Likes 0	
Dislikes 0	
Response	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ben Hammer - Western Area Power Administration - 1,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

2. Energy Reliability Assessment Temporal Requirements (1): The SDT proposes several temporal parameters for the regular performance of Near-Term Operational Planning Energy Reliability Assessments (OPERA). The first is the requirement that the study begin within 48 hours following the completion of each assessment. The intent is that the first hour of the Near-Term OPERA would not be too far in the future, ensuring the starting point is based upon current information. Is using a starting point of no more than 48 hours in the future appropriate? If not, please comment with alternate language and explanation of recommended changes.

Alan Kloster - Evergy - 1,3,5,6 - MRO	
Answer	No
Document Name	
Comment	
Evergy supports and incorporates by reference the comments of the Edison Electric Institute for questions #2.	
Likes 0	
Dislikes 0	
Response	

Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators	
Answer	No
Document Name	
Comment	
The proposed language in R1.1.1 is not clear. If the intent is “that the first hour of the Near-Term OPERA would not be too far in the future, ensuring the starting point is based upon current information” then the language should reflect this. As written the actual intent is obfuscated. Based on our interpretation of the language and stated intent of the proposed Requirement 1, we recommend modifying the language in R1.1.1 as follows: “The Study Period should be sufficiently sized so that in conjunction with the Study Frequency, the Study Period for the current Near-Term OPERA will begin no more than 48-hours in the future from the current Operating Day.”	
Likes 0	
Dislikes 0	
Response	

Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	No
Document Name	
Comment	

ERCOT joins the comments submitted by the IRC SRC and adopts them as its own.

Likes 0	
Dislikes 0	

Response

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

Answer	No
Document Name	

Comment

AZPS feels the performance of ERAs should provide regional flexibility and be based on the operational experience of the Balancing Authority to identify when an ERA should be performed and the time frames associated, such that the resultant ERA is meaningful and useful in addressing any potential reliability concerns.

Likes 0	
Dislikes 0	

Response

Harishkumar Subramani Vijay Kumar - Independent Electricity System Operator - 2, Group Name IRC SRC

Answer	No
Document Name	

Comment

Requirement R1 is ambiguous on this topic. Requirement R1, part 1.1.1 states that the study period will begin within 48 hours following the completion of each assessment. Study Period is defined on page 2 of the draft standard as the time period between the start and end of an Energy Reliability Assessment, but, as noted in the SRC's response to question 1, the term "study period" is not capitalized in part 1.1.1, so it is unclear if the formal definition is intended to apply. Even if the formal definition is intended to apply, it is unclear whether the definition refers to the start and end dates of the time period analyzed by an Energy Reliability Assessment or the start and end dates of the time when a BA is actively performing the Energy Reliability Assessment. If Study Period is intended to refer to the start and end dates of the time period analyzed by an ERA, the SRC recommends that the definition be revised to read "The time period analyzed by an Energy Reliability Assessment." Meanwhile, R1 refers in several places to a Study Duration, with the capitalization implying that Study Duration is a defined term, but Study Duration does not appear in the list of new or modified defined terms on page 2 of the draft standard or in the NERC Glossary of Terms. It is likewise unclear whether Study Duration is intended to refer to the Study Period or to a different concept. Due to these ambiguities, the SRC is uncertain what would be required to begin within 48 hours of the completion of each assessment and is therefore unable to fully comment on whether the 48-hour period is appropriate. The SRC recommends that the function of the 48-hour period be clarified, and regardless of the intended function, the SRC recommends that the timeframe be extended to 72 hours to allow entities more flexibility in implementing the requirement. The SRC also notes that it is unclear whether the term "study" and the term "assessment" refer to the same thing or different things in R1 and recommends that only one term be used or that both terms be defined in the interest of clarity. Finally, the SRC requests that the phrase "the time period covered by the future/prompt and assessment" in part 1.1.2 be clarified as proposed below. We suggest the following wording changes for the following sub-requirements: o Requirement 1.1.1.: Replace the currently proposed wording with "The Near-Term OPERA must assess a study period that begins no later than 72 hours in the future". o Requirement 1.1.2: Change the currently proposed wording

"must extend into the time period covered by the future/prompt and assessment" to "must extend into the time period covered by the next or subsequent assessment".	
Likes 0	
Dislikes 0	
Response	
Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5, Group Name BC Hydro	
Answer	No
Document Name	
Comment	

Requirement R1 appears confusing as drafted.

A. R1 requires a Near-Term OPERA process, while the subsequent subparts address the Near-Term OPERA itself. Recommend that “The Near-Term OPERA shall:” be changed to “The process should ensure that the Near-Term OPERA shall:”.

B. Part 1.1 requires a documented Study Duration – this is capitalized, however it is not a defined term.

C. The subparts R1.1.1 through R1.1.4 attempt to be prescriptive, however are hard follow. Specifically:

- Subpart 1.1.1 seems to define when a study period begins. First, should study period be capitalized as it is a defined term? Second, is Subpart 1.1.1 intended to mean that the entity has up to 48 hours to start a new Near-Term OPERA from the end of the previous Near-Term OPERA? The survey Question #2 indicates “intent is that the first hour of the Near-Term OPERA would not be too far in the future”. This does not seem to align with the definition of Study Period.
- Depending on the intent of the “time period” referenced in Subpart 1.1.2, this potentially conflicts with Subpart 1.1.1.

D. Part 1.2 “The Near-Term OPERA shall use a base case that includes:” should be revised to “Use a base case that includes:” to align with R1 and R1.1 language.

E. The volume of data requirements as implied under Part 1.2 and its Subparts, and the expected associated evidence may be particularly burdensome. BC Hydro recommends that these specifics be moved to a guideline and not be a requirement, as the entity should be able to identify criteria that may be more applicable to the entity versus defining the base case criteria that may not fit all.

F. The use of “Reliability Coordinator-reviewed” language in Requirement R1 appears to establish a requirement for the RC to review the BA Near-Term OPERA process as part of the BA’s compliance for R1 ie the BA’s process would be found non-compliant per R1 if the RC hadn’t reviewed it. As there are specific Requirements for the BA to submit R1 process to the RC in R3, BC Hydro suggests that this is not required and recommends revising R1 wording to remove this language.

Likes 0	
Dislikes 0	
Response	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	No

Document Name	

Comment

EEI does not support the approach proposed in Requirement R1. This approach is too prescriptive; as such, it interferes with needed regional flexibility. Instead, EEI suggests the adoption of a more simplified approach based on ERA Operating Processes. Such an approach should be based on the operational experience of the Balancing Authority so that the BA can decide when an ERA should be performed and the associated time frames, such that the resulting ERA is meaningful and useful in addressing any potential reliability concerns specific to their regional responsibilities. An ERA Operating Process with the requirement to address the rationale would be sufficient.

EEI offers the following proposed changes to Requirements R1 for consideration:

R1: Each Balancing Authority shall develop, document, and maintain a Reliability Coordinator-reviewed Energy Reliability Assessment (ERA) Operating Process. The ERA Operating Process shall:

1.1. Identify what operational conditions should be met when an ERA is performed; and

1.2. Provide the rationale for how the operational conditions were selected.

1.3. Define how the ERA will be performed for each period of time to be assessed when the operational conditions are met. At a minimum, the ERA Operating Process shall document the methodology for at least two periods of time—namely, next day and seasonal ERAs, including:

1.3.1. The components to be considered in the ERA;

1.3.2. The rationale for the components to be considered in the ERA;

1.3.3. The components to be considered in the ERA that should be varied to provide a broader risk assessment, based on regional operational experience;

1.3.4. The rationale for selection of the components in the ERA that should be varied; and

1.3.5. The entities that should receive the ERA when performed.

Likes 0	
Dislikes 0	

Response

David Jendras Sr - Ameren - Ameren Services - 1,3,6

Answer	No
Document Name	

Comment

Ameren agrees with and supports MISO's comments.

Likes 0	

Dislikes 0	

Response

Keith Jonassen - ISO New England, Inc. - 2 - NPCC	
Answer	No
Document Name	

Comment

While ISO-NE agrees that a starting hour of no more than 48 hours in the future would be appropriate, ISO-NE believes that each BA should be able to determine its own Near-Term Opera Study Frequency, Study Period, and Study Temporal Resolution with corresponding rationale for each as well as a Base Case for the OPERA Study.

Suggested modification of R1:

R1. Each Balancing Authority shall develop, document, and maintain a Reliability Coordinator-reviewed Near-Term Operations Planning Energy Reliability Assessments (OPERA) process. The Near-Term OPERA shall include:

1.1. A Study Frequency;

1.2. A Study Period;

1.3. A Study Temporal Resolution, and;

1.4. A corresponding rationale for each selection in R1.1 – R1.3.

1.5. A base case that includes:

1.5.1. Forecasted demand including demand side management and demand response;

1.5.2. Expected generator capability considering:

• known constraints;

• availability and flexibility;

• fuel supply and inventory concerns;

• fuel switching capabilities;

• environmental constraints, and;

• energy storage capability.

1.5.3. Expected transmission usage and coordinated and agreed upon transfers with adjacent Balancing Authorities;

1.5.4. Planned generation and transmission outages; and;

1.5.5. Unplanned generation and transmission outages.

Revision details:

Reordered the sub-requirments for clarity.

1.5 Created sub-requirements for the Base case and consolidated the list as needed.

1.5.2 Expanded the list to sub-bullets to encompass generatoir capability considerations.

1.5.3 Added “with adjacent BAs”

1.5.4 Changed Expected to planned ans outages are planned

1.5.5 Added unplanned outages which would take into consideration EFORd outage rates, etc.

ISO-NE will submit a redline version of TOP-0XX-X in the response for Question #13

Likes 0	
Dislikes 0	

Response

Leslie Burke - Southern Company - Southern Company Generation - 5,6, Group Name Southern Company

Answer	No
Document Name	

Comment

Southern Company supports the EEI comments and does **not** support the approach proposed in Requirement R1

Likes 0	
Dislikes 0	

Response

Jason Snodgrass - Georgia System Operations Corporation - 3 - SERC

Answer	No
Document Name	

Comment

GSOC does not agree with the requirement as written due to it being overly prescriptive and not providing regional flexibility. GSOC is supportive of the alternate language being submitted by Southern Company.

Likes 0	
Dislikes 0	

Response

Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO	
Answer	No
Document Name	
Comment	
There needs to be some consideration on holidays & long weekend which is beyond 48 hours. MH also supports MRO NSRF's vote and comments for this one.	
Likes 0	
Dislikes 0	
Response	
Nikki Carson-Marquis - Minnkota Power Cooperative Inc. - 1 - MRO	
Answer	No
Document Name	
Comment	
Minnkota Power Cooperative supports comments by the MRO New Standards Review Forum (MRO NSRF) and ACES.	
Likes 0	
Dislikes 0	
Response	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	No
Document Name	
Comment	
BPA believes the temporal parameters language of this requirement is subject to conflict in interpretation. The timeframes need to be better defined. The requirement does not use the capitalized defined term for study period, which may lead to confusion. The starting point of 48 hours in the future is appropriate.	
Likes 0	
Dislikes 0	
Response	

Jennie Wike - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6 - WECC, Group Name Tacoma Power	
Answer	No
Document Name	
Comment	
Tacoma Power endorses MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Sean Steffensen - IDACORP - Idaho Power Company - 1	
Answer	No
Document Name	
Comment	
The requirement in 1.1.1 is unclear. Is the intent that once one OPERA concludes, the next one begins within 48 hours? It is unclear what “assessment” is referring to. It is also unclear how this relates to the requirement in 1.1.2 about assessments being performed at least monthly. Also, it appears that the requirements are to have a documented process regarding Near-Term OPERA studies, including scenarios that the RC has reviewed. Is there a requirement that the data or studies be sent to the RC or anywhere else? In bilateral/non-organized markets, the assessments envisioned here are performed on an informal basis daily for at least the preschedule day(s). In addition, entities may have their own resource sufficiency/resource adequacy programs or requirements that entail similar evaluations for upcoming time periods such as peak seasons. However, there may or may not be existing requirements to run analysis over a broad spectrum of scenarios even for non-peak months or seasons. Running and retaining the studies and the various scenarios on the timelines listed in the draft standard could take significant resources and time. This effort may be somewhat duplicative of other resource adequacy efforts. NERC should consider whether this requirement and standards are necessary given those other efforts.	
Likes 0	
Dislikes 0	
Response	
Kendra Buesgens - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	No
Document Name	

Comment
The MRO NSRF believes it is appropriate to require the study period is not too far in the future; however, at 48 hours, it limits entities from starting a study on Friday to cover a Study Period beginning the following Monday. Recommend making it up to **96 hours** in the future. This will allow for analysis performed on Friday to cover the period beginning on Monday. The wording seems awkward. Suggest "The Near-Term OPERA must assess a study period that begins no later than **96 hours** in the future. Re: Part 1.1.2 Should "must extend into the time period covered by the future/prompt and assessment" read "must extend into the time period covered by the next or subsequent assessment" ? **Recommend the SDT provide a timeline example in the Technical Rationale.**

Likes 0	
Dislikes 0	

Response

Ben Hammer - Western Area Power Administration - 1,6	
Answer	No
Document Name	

Comment
While WAPA agrees that 48 hours is a reasonable duration between Near-Term OPERA Study Periods, the Requirement R1, Part 1.1.1 language is confusing, potentially implying that the SDT intends to encourage gaps between Near-Term OPERA Study Periods and when the studies are actually commenced. Instead, the language should be revised to clearly state: ***1.1.1 Consecutive Near-Term OPERA Study Periods shall overlap by at least one hour.***

Likes 0	
Dislikes 0	

Response

Tim Kelley - Sacramento Municipal Utility District - 1,3,4,5,6 - WECC, Group Name SMUD	
Answer	No
Document Name	

Comment

Likes 0	
Dislikes 0	
Response	
Lindsay Wickizer - Berkshire Hathaway - PacifiCorp - 6	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Casey Perry - PNM Resources - 1,3 - WECC,Texas RE	
Answer	Yes
Document Name	
Comment	
PNMR agrees with the 48 hour time frame for the Near-Term OPERA study period following the completion of each assessment, the use of assessment and study interchangeable in Requirement R1 adds some confusion.	
Likes 0	
Dislikes 0	
Response	
Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF	
Answer	Yes
Document Name	
Comment	
-For R1.1.1, “Study Period” should be capitalized.	
Likes 0	
Dislikes 0	

Response	
Hillary Creurer - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	
Document Name	
Comment	

Texas RE noticed the following:

• Part 1.1.1. - The term “study period “ should be capitalized as it is a proposed defined term. Part 1.1.1 should also be changed from “will” to “shall” as it is a requirement. Texas RE recommends the SDT clarify what is considered completion of assessment. The SDT may want to consider what occurs during weekends and holidays.

• The SDT could clarify Part 1.1.2 and what the intention around “covered by the future/prompt and assessment and” is.

• Part 1.1.4 “Study Duration” is not defined; is this intended to be Study Period, which is proposed to be defined?

• It would be helpful for the SDT to provide an example timeline for multiple ERAs as there could be several on-going timelines to consider.

• Part 1.2.3 – The terms “expected transmission usage” and “coordinated and agreed upon transfers” could be clarified in order to drive consistency.	
Likes 0	
Dislikes 0	
Response	

3. Energy Reliability Assessment Temporal Requirements (2): The minimum Study Frequency (how often a Near-Term OPERA is performed) is set to monthly to ensure that results do not become outdated. The Study Frequency is also a function of study duration (how many days/hours the Near-Term OPERA looks at). The requirement for Study Frequency to be less than or equal to the study duration ensures that no period of time is uncovered by a Near-Term OPERA. Is the requirement to perform a Near-Term OPERA no less than monthly, appropriate, or should it be more or less frequent? If more or less frequent, please comment with alternate language.

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

Answer	
Document Name	

Comment

A minimum two-week frequency seems or appropriate, or at least a full assessment at least monthly, with incremental assessments more frequently ?

Regarding Study Frequency: The time period between when Energy Reliability Assessments are performed could be confused to mean the time between the end of one and the start of the next. Better to say it is how often an assessment is carried out, e.g. every seven days on a Friday, every 14 days on a Friday, every month on the first Friday, etc.

Recommend the SDT provide a timeline example in the Technical Rationale.

Likes 0	
Dislikes 0	

Response

Nikki Carson-Marquis - Minnkota Power Cooperative Inc. - 1 - MRO

Answer	
Document Name	

Comment

Minnkota Power Cooperative supports comments by the MRO New Standards Review Forum (MRO NSRF) and ACES.

Likes 0	
Dislikes 0	

Response

David Jendras Sr - Ameren - Ameren Services - 1,3,6

Answer	
Document Name	

Comment

Ameren agrees with and supports MISO's comments.	
Likes 0	
Dislikes 0	
Response	
Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5, Group Name BC Hydro	
Answer	
Document Name	
Comment	
The Question #3 of the survey does not seem to align with the current draft of the definition, i.e. the definition doesn't set the Study Frequency to monthly. BC Hydro advocates for an entity to establish what an optimal Study Frequency would be, and not have a prescripted minimum in the Requirement.	
Likes 0	
Dislikes 0	
Response	
Harishkumar Subramani Vijay Kumar - Independent Electricity System Operator - 2, Group Name IRC SRC	
Answer	
Document Name	
Comment	
As discussed in our response to Q1 regarding Study Frequency, the time period between when ERAs are performed could be confused to mean the time between the end of one and the start of the next. The language should be clarified to refer to how often an assessment is carried out, e.g. every seven days on a Friday, every 14 days on a Friday, every month on the first Friday, etc. Additionally, the SRC recommends that the SDT provide a timeline example of how the study process is intended to function in the Technical Rationale.	
Likes 0	
Dislikes 0	
Response	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	
Document Name	
Comment	

ERCOT joins the comments submitted by the IRC SRC and adopts them as its own.	
Likes 0	
Dislikes 0	
Response	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC	
Answer	Appropriate
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ben Hammer - Western Area Power Administration - 1,6	
Answer	Appropriate
Document Name	
Comment	
WAPA concurs with the concept of monthly performance of Near-Term OPERAs, but this conflicts with the proposed Near-Term OPERA definition which states “no more than six weeks.” Furthermore, experience has shown that Reliability Standard references to “monthly” have been inconsistently interpreted by compliance authorities. Therefore, WAPA recommends the following clarifying changes to Requirement R1, Part 1.1.2, in combination with the changes suggested to Part 1.1.1 above: ***1.1.2 The Near-Term OPERA maximum Study Frequency shall not exceed six weeks.***	
Likes 0	
Dislikes 0	
Response	
Hillary Creurer - Allete - Minnesota Power, Inc. - 1	
Answer	Appropriate
Document Name	
Comment	

Likes 0	
Dislikes 0	

Response

Jennie Wike - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6 - WECC, Group Name Tacoma Power

Answer	Appropriate
Document Name	

Comment

Tacoma Power concurs with the MRO NSRF comment that a visual timeline example is needed in the Technical Rationale to understand the study period frequency and duration.

Likes 0	
Dislikes 0	

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer	Appropriate
Document Name	

Comment

Texas RE noticed that this question has the statement: Study Frequency (how often a Near-Term OPERA is performed). The proposed definition of Study Frequency, however, is the time period between Energy Reliability Assessments are performed.

Texas RE encourages the SDT to consider the scenario where forecasted weather changes significantly. Can the Near-Term OPERA be redone within the Study Period of the existing Near-Term OPERA? If so, this should be included in R1.1.

Likes 0	
Dislikes 0	

Response

Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO

Answer	Appropriate

Document Name	
Comment	
Need some clarification regarding to R1.1 part regarding to timeline. Please provide some example to clarify. But monthly review is reasonable.	
Likes 0	
Dislikes 0	
Response	
Keith Jonassen - ISO New England, Inc. - 2 - NPCC	
Answer	Appropriate
Document Name	
Comment	
ISO-NE agrees that at least monthly would be appropriate, however, ISO-NE also believes that each BA should be able to define their own Study Frequency in their RC reviewed OPERA. (See ISO-NE reponse for R1 suggested modification. ISO-NE also recommends providing a timeline example in the Technical Rationale Document to show what each of the definitions mean and where they could fall in a BA's OPERA Plan. ISO-NE will submit a redline version of TOP-0XX-X in the response for Question #13	
Likes 0	
Dislikes 0	
Response	
Casey Perry - PNM Resources - 1,3 - WECC,Texas RE	
Answer	Appropriate
Document Name	
Comment	
PNMR supports the requirement to perform a Near-Term OPERA no less than monthly.	
Likes 0	
Dislikes 0	
Response	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators	

Answer	Appropriate
Document Name	
Comment	

We believe the maximum Study Frequency is appropriate; however, we recommend modifying the language of proposed Requirement 1.1.2 to include the newly defined term Study Period. Please consider the proposed language below:

“The Study Frequency will be set such that the Study Period covered by the current Near-Term OPERA must extend into the Study Period covered by the next subsequent Near-Term Opera. The maximum allowable Study Frequency is 1 calendar month.”

Likes 0	
Dislikes 0	
Response	

Sean Steffensen - IDACORP - Idaho Power Company - 1

Answer	Less frequent
Document Name	
Comment	

Any requirements regarding frequency of assessments should be based on the specific facts and circumstances of the region. Is the requirement to perform Near-Term OPERAs intended to be a requirement that applies all year round, or only in defined seasons or months? Depending on the region, having an affirmative requirement in all months may not be necessary.

Likes 0	
Dislikes 0	
Response	

Jason Snodgrass - Georgia System Operations Corporation - 3 - SERC

Answer	Less frequent
Document Name	
Comment	

GSOC does not agree with the temporal requirements described. GSOC is of the opinion that the BA should be able to determine the specifics regarding ERAs in its area. GSOC is supportive of the alternate language being submitted by Southern Company.

Likes 0	
Dislikes 0	
Response	

Leslie Burke - Southern Company - Southern Company Generation - 5,6, Group Name Southern Company	
Answer	Less frequent
Document Name	
Comment	
Southern Company supports the EEI comments and does **not** agree with the ERA Temporal Requirements.	
Likes 0	
Dislikes 0	
Response	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Less frequent
Document Name	
Comment	
EEI does not agree with the ERA Temporal Requirements. Performance of ERAs should provide regional flexibility and be based on the operational experience of the Balancing Authority to identify when an ERA should be performed, associated time frames, and frequency of the ERA such that the resulting ERA is meaningful and useful in addressing any potential reliability concerns. An ERA Operating Process including a technical rationale to document that process should be sufficient.	
Likes 0	
Dislikes 0	
Response	
Marcus Bortman - APS - Arizona Public Service Co. - 1,3,5,6	
Answer	Less frequent
Document Name	
Comment	
AZPS feels the performance of ERAs should provide regional flexibility and be based on the operational experience of the Balancing Authority to identify when an ERA should be performed, time frames associated, and frequency of the ERA such that the resultant ERA is meaningful and useful in addressing any potential reliability concerns. An ERA Operating Process with the requirement to address the rationale would be sufficient.	
Likes 0	
Dislikes 0	

Response	
Alan Kloster - Evergy - 1,3,5,6 - MRO	
Answer	Less frequent
Document Name	
Comment	
Evergy supports and incorporates by reference the comments of the Edison Electric Institute for questions #3.	
Likes 0	
Dislikes 0	
Response	
Tim Kelley - Sacramento Municipal Utility District - 1,3,4,5,6 - WECC, Group Name SMUD	
Answer	Less frequent
Document Name	
Comment	
There is already the regular Resource Adequacy process for BAs and Load Serving Entities to perform monthly, seasonally, and annual evaluations. There is no need to define a new process.	
Likes 0	
Dislikes 0	
Response	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	More frequent
Document Name	
Comment	
BPA believes these assessments would provide the most value if performed for approximately the next week out based on the quality of available data; for example: variable energy resources, load and weather forecasts. BPA believes that the maximum study frequency should be 7 days. This question in the comment form refers to **minimum** study frequency, however the standard itself refers to **maximum** study frequency. Please double check which word is intended. Minimum seems to make more sense, however it may be more clear to state that the requirement is to assess every hour seven days out.	

This sentence appears to have a typo, and also, we don't understand what is meant by future/**prompt**: "…future/prompt and assessment and will be performed at least monthly."	
Likes 0	
Dislikes 0	
Response	
Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF	
Answer	More frequent
Document Name	
Comment	
-Suggest that the minimum study frequency be at least once every two weeks.	
Likes 0	
Dislikes 0	
Response	

4. Energy Reliability Assessment: R1.1 and R1.2 are intended to add requirements that outline the elements that should be included in a Near-Term OPERA but allow Balancing Authorities (BA) with different concerns to have flexibility to implement the assessment such that the assessments are useful. Do you agree with the level of specificity in these requirements? If not, would you prefer that the requirements related to this are more or less specific? Additionally, please comment on what requirements should be removed, clarified, or changed.

Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2

Answer	
Document Name	

Comment

ERCOT joins the comments submitted by the IRC SRC and adopts them as its own.

Likes 0	
Dislikes 0	

Response

Harishkumar Subramani Vijay Kumar - Independent Electricity System Operator - 2, Group Name IRC SRC

Answer	
Document Name	

Comment

The proposed elements in the OPERA go beyond a Balancing Authority's function and extend into those of a Transmission Operator (TOP), specifically, Parts 1.2.3 and 1.2.4 and Table 1, footnotes 1 and 2. This needs to be reconsidered and assigned to the appropriate function. It is difficult to conceive how a Balancing Authority can prepare a more extensive look ahead that considers transmission usage, outages and contingencies that result in the loss of supply without the Transmission Operator performing a parallel analysis. At a minimum, the TOP should consider System Operating Limits (SOLs) to ensure they are not exceeded in the OPERA. Alternatively, the scope of the OPERA could be narrowed to focus solely on the ability of a BA to adequately meet its anticipated energy needs via unit commitment. Under this approach, no analysis of transmission would need to be performed and could be accomplished entirely within the BA's purview; however, it would also reduce the usefulness of the study. To the extent a more holistic approach is retained, the SRC recommends the applicability of TOP-XXX be expanded to include the TOP. 4. Applicability: 4.1. Functional Entities: 4.1.1. Balancing Authority 4.1.2. Reliability Coordinator 4.1.3. Transmission Operator The SRC also notes that the use of the term "expected" throughout part 1.2 renders part 1.2 ambiguous regarding the degree of certainty required before a potential event or a particular Resource status or contingency must be included in the base case. The SRC recommends that the term "expected" be replaced with the term "projected" to provide clarity on this point. The SRC also requests that the drafting team provide additional guidance on this point in the technical rationale or a whitepaper. Additionally, part 1.2.4 is unclear regarding whether all contingencies are intended to be included in each study execution. The current wording implies that all contingencies should be included, but that might go beyond the standard's underlying purpose of addressing energy assurance. The SRC recommends that the standard language be clarified and additional guidance be provided in the technical rationale or a whitepaper to address this ambiguity.

Likes 0	
Dislikes 0	

Response

David Jendras Sr - Ameren - Ameren Services - 1,3,6	
Answer	
Document Name	
Comment	
Ameren agrees with and supports MISO's comments.	
Likes 0	
Dislikes 0	
Response	
Tim Kelley - Sacramento Municipal Utility District - 1,3,4,5,6 - WECC, Group Name SMUD	
Answer	Should be less specific
Document Name	
Comment	
TOP-002 already defines the elements that a BA should consider for next-day assessment. There is no need to define anything new.	
Likes 0	
Dislikes 0	
Response	
Alan Kloster - Evergy - 1,3,5,6 - MRO	
Answer	Should be less specific
Document Name	
Comment	
Evergy supports and incorporates by reference the comments of the Edison Electric Institute for questions #4.	
Likes 0	
Dislikes 0	
Response	
Marcus Bortman - APS - Arizona Public Service Co. - 1,3,5,6	
Answer	Should be less specific

Document Name	
Comment	
AZPS does not agree with the specificity in these requirements, the current R1.1 requirements for Study Frequency, Study Duration, and Study Temporal Resolution and the R1.2.2 requirements for base cases to be too specific. The study parameters should provide regional flexibility and be based on the operational experience of the Balancing Authority such that they are developed by the Balancing Authority with a rationale for how those parameters were determined.	
Likes 0	
Dislikes 0	
Response	
Lindsay Wickizer - Berkshire Hathaway - PacifiCorp - 6	
Answer	Should be less specific
Document Name	
Comment	
The applicability of TOP-XXX must be expanded to include the TOP. In addition, to the extent TOP-XXX requires BAs (and TOPs) to consider generator specific factors such as: fuel supply and inventory, consumable fuels, environmental constraints, emission limits, etc., in preparing its OPERA, TOP-XXX *must* also include a corresponding requirement for Generator Operators (GOP) to provide the BA and TOP with this information for the time horizon required. **4. Applicability:** **4.1. Functional Entities:** **4.1.1.** Balancing Authority **4.1.2.** Reliability Coordinator **4.1.3.** Transmission Operator **4.1.4**. Generator Operator	
Likes 0	
Dislikes 0	
Response	
Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5, Group Name BC Hydro	

Answer	Should be less specific
Document Name	
Comment	
BC Hydro believes that the Requirement is too prescriptive. The “process” that is developed should be adequate to cover what is needed by the entity.	
Likes 0	
Dislikes 0	
Response	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Should be less specific
Document Name	
Comment	
EEI does not support the proposed R1.1 and R1.2. Requirements. Those related to Study Frequency, Study Duration, and Study Temporal Resolution, and the requirements for base cases, which we believe are too specific. The study parameters should provide regional flexibility and be based on the operational experience of the Balancing Authority such that they are developed by the Balancing Authority with a rationale for how those parameters were determined. See the proposed language offered in our response to question 2.	
Likes 0	
Dislikes 0	
Response	
Keith Jonassen - ISO New England, Inc. - 2 - NPCC	
Answer	Should be less specific
Document Name	
Comment	
ISO-NE believes that each BA should be able to determine its own Near-Term Opera Study Frequency, Study Period, and Study Temporal Resolution with corresponding rationale for each as well as a Base Case for the OPERA Study. ISO-NE will submit a redline version of TOP-0XX-X in the response for Question #13	
Likes 0	
Dislikes 0	
Response	

Leslie Burke - Southern Company - Southern Company Generation - 5,6, Group Name Southern Company	
Answer	Should be less specific
Document Name	
Comment	
Southern Company supports the EEI comments and does **not** support the proposed R1.1 and R1.2. Requirements.	
Likes 0	
Dislikes 0	
Response	
Jason Snodgrass - Georgia System Operations Corporation - 3 - SERC	
Answer	Should be less specific
Document Name	
Comment	
GSOC does not agree with the level of specificity in the requirements, believing them to be overly specific. Rather, the requirements should be determined by each BA based on its operational experience. GSOC is supportive of the alternate language being submitted by Southern Company.	
Likes 0	
Dislikes 0	
Response	
Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO	
Answer	Should be less specific
Document Name	
Comment	
The standard mentioned the “fuel supply and inventory concerns and fuel switching capabilities”. To cover a wide range of resources, this part needs to state more generic. MH also support MRO NSRF’s vote and comments for this one.	
Likes 0	
Dislikes 0	
Response	
Nikki Carson-Marquis - Minnkota Power Cooperative Inc. - 1 - MRO	

Answer	Should be less specific
Document Name	
Comment	
Minnkota Power Cooperative supports comments by the MRO New Standards Review Forum (MRO NSRF) and ACES.	
Likes 0	
Dislikes 0	
Response	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Should be less specific
Document Name	
Comment	
BPA recommends that the requirements be less specific. The details should be left to the BA running the studies based on the key aspects of the systems they study. This would allow for regional flexibility. BPA suggests Requirement 1.2.3 be changed from “transmission usage” to “transmission deliverability”. BPA understands 1.2.3 is requiring the BA to ensure that the energy is deliverable to the load and this is commonly referred to as transmission deliverability. BPA suggests that throughout the standard the term “case” should be changed to “assessment”, including 1.2 and Table 1. Base case implies a power flow study is being performed. It is possible to meet the requirements of an OPERA using various methods of system analysis.	
Likes 0	
Dislikes 0	
Response	
Jennie Wike - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6 - WECC, Group Name Tacoma Power	
Answer	Should be less specific
Document Name	
Comment	
Tacoma Power endorses MRO NSRF comments.	
Likes 0	
Dislikes 0	

Response	
Sean Steffensen - IDACORP - Idaho Power Company - 1	
Answer	Should be less specific
Document Name	
Comment	
Assessment frequency and scenarios should be customizable based on the facts and circumstances of the region.	
Likes 0	
Dislikes 0	
Response	
Kendra Buesgens - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	Should be less specific
Document Name	
Comment	

The proposed elements in the OPERA go beyond a Balancing Authority's function and extend into those of a Tranmission Operator (TOP), specifically, Parts 2.1.3 and 2.1.4 and Table 1, footnotes 1 and 2. This needs to be reconsidered and assigned to the appropriate function.

It is difficult to conceive how a Balancing Authority can prepare a more extensive look ahead that considers transmission usage, outages and contingencies that result in the loss of supply without the Transmission Operator performing a parallel analysis. At a minimum, the TOP should consider System Operating Limits (SOLs) to ensure they are not exceeded in the OPERA.

Alternatively, the scope of the OPERA could be narrowed to focus solely on the ability of a BA to adequately meet its anticipated energy needs via unit commitment. Under this approach, no analysis of transmission would need to be performed and could be accomplished entirely within the BA's purview; however, it would also reduce the usefulness of the study.

To the extent a more holistic approach is retained, the MRO NSRF recommends the applicability of TOP-XXX be expanded to include the TOP.

In addition, to the extent TOP-XXX requires BAs (and TOPs) to consider generator specific factors such as: fuel supply and inventory, consumable fuels, environmental constraints, emission limits, etc., in preparing its OPERA, TOP-XXX *must* also include a corresponding requirement for Generator Operators (GOP) to provide the BA and TOP with this information for the time horizon required.

4. Applicability:

4.1. Functional Entities:

4.1.1. Balancing Authority

4.1.2. Reliability Coordinator

4.1.3. Transmission Operator

4.1.4. Generator Operator

Likes 0	
Dislikes 0	

Response

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

Answer	Appropriately specific
Document Name	

Comment

- Requirements 1.1 and 1.1.4 use the term “Study Duration”; however, this is not a defined term. We recommend moving Requirement 1.1.4 to become the new Requirement 1.1.2, renumbering the subsequent Requirement Parts, and updating the language as follows:

“The total duration of the Study Period shall be no less than 7 days.”

- We agree with the stated intent of allowing BAs the flexibility to implement assessments that address their specific concerns; however, the proposed language of Requirement 1.2 seems to indicate that only the identified subparts shall be included in the base case. Furthermore, Requirement R1 ends with the phrase “The Near-Term OPERA shall:” and part 1.2 begins with the same phrase. We recommend modifying Requirement 1.2 as follows:

“Use a base case that, at a minimum, includes:”

Likes 0	
Dislikes 0	

Response

Casey Perry - PNM Resources - 1,3 - WECC,Texas RE

Answer	Appropriately specific
Document Name	

Comment

PNMR agrees with level of specificity for R1.1 and R1.2.

Likes 0	
Dislikes 0	

Response	
Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF	
Answer	Appropriately specific
Document Name	
Comment	
-Suggest revising R1.1.3 language to read: 1.1.3. The Study Temporal Resolution “shall be no more than 1-hour”.	
Likes 0	
Dislikes 0	
Response	
Hillary Creurer - Allete - Minnesota Power, Inc. - 1	
Answer	Appropriately specific
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ben Hammer - Western Area Power Administration - 1,6	
Answer	Appropriately specific
Document Name	
Comment	
While specificity is good, the ambiguity in the existing proposed language is problematic. Please see suggestions for Requirement R1, Parts 1.1.1 and 1.1.2 above. Additionally, Requirement R1, Part 1.1.3 has two problems: first, it uses atypical language for a Reliability Standard; and, second, the maximum of one hour seems arbitrarily short especially considering energy scheduling that can be appropriately conducted at other periodicities including three, six, twelve or longer hours. The suggested modification is: ***1.1.3. The Study Temporal Resolution shall not exceed 3 hours.***	
Likes 0	
Dislikes 0	

Response	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC	
Answer	Appropriately specific
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

5. Near-Term OPERA Scenarios: The SDT is proposing to require the development and analysis of scenarios which have a reasonable risk of occurring through the time-horizon of the Near-Term OPERA. Table 1 includes standard scenarios that shall also be evaluated. These scenarios shall have documented criteria which specify when implementing a mitigation Operating Process solution is required. Do you agree with the language in the requirement? If not, please comment with alternate language and explanation of recommended changes.

Ben Hammer - Western Area Power Administration - 1,6

Answer	No
Document Name	

Comment

The Table 1 scenarios are appropriate, but Requirement R2, Part 2.1.2 is ambiguous and creates an open-ended obligation for a BA to develop, document, and maintain a list of scenarios with "likely risk of occurring" without defining likely risk (e.g., is a 1-in-10 year LOLE event "likely" in any Near-Term OPERA horizon?). Furthermore, Requirement R2 uses atypical language for a Reliability Standard. WAPA recommends the following clarifying changes to Requirement R2:

R2. Each Balancing Authority shall develop, document, and maintain a set of Reliability Coordinator-reviewed Near-Term OPERA scenarios.

2.1. The Near-Term OPERA scenarios developed shall include:

2.1.1. All scenarios listed in Table 1

2.1.2. Any additional scenarios within the Operations Planning time horizon selected by the Balancing Authority according to its documented risk-based approach that considers.

2.2. All The Balancing Authority shall establish criteria for each Near-Term OPERA scenarios to determine when implementing an Operating Process is required.

Likes 0	
Dislikes 0	

Response

Hillary Creurer - Allete - Minnesota Power, Inc. - 1

Answer	No
Document Name	

Comment

Minnesota Power supports EEI's comments.

Likes 0	
Dislikes 0	

Response

Kendra Buesgens - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	No
Document Name	
Comment	

Table 1 is overly prescriptive, even dictating the level of supply interruption, e.g., 50%, to be considered. To the extent TOP-XXX requires BAs to consider factors such as: fuel supply and inventory, consumable fuels, environmental constraints, emission limits, etc., in preparing its OPERA, TOP-XXX must also include a corresponding requirement for Generator Operators (GOP) to provide the BA with this data over the time horizon required as BAs.

In addition, several proposed elements in the OPERA go beyond a Balancing Authority's function and extend into those of a Tranmission Operator (TOP), specifically, Table 1, footnotes 1 and 2. This needs to be reconsidered and assigned to the TOP function.

Recommendation: The MRO NSRF recommends an alternative. Let the OPERA process (or methodology) dictate the process and scenarios to be studied. This would eliminate the need for Table 1 in the standard.

Consider assigning the development of the OPERA process (or methodology) to the RC and a corresponding requirement on BAs and TOPs to follow the RC's process. This would ensure consistency and coordination in an efficient manner.

Finally, the MRO NSRF recommends the applicability of TOP-XXX be expanded to include the TOP and GOP functions as detailed in our response to Question 4.

Likes 0	
Dislikes 0	
Response	

Sean Steffensen - IDACORP - Idaho Power Company - 1	
Answer	No
Document Name	
Comment	

Is the proposed requirement that entities have distinct Operating Plans to address every possible scenario, depending on whether or not an EEA 2 or 3 is forecasted? What kind of documentation or evidence would be required to demonstrate a sufficient Operating Plan? Entities already have operation plans with regard to EEAs; would those plans potentially be sufficient, depending on the circumstances and scenario?

Likes 0	
Dislikes 0	
Response	

Jennie Wike - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6 - WECC, Group Name Tacoma Power	
Answer	No

Document Name	
Comment	
Tacoma Power supports the comments from MRO NSRF.	
Likes 0	
Dislikes 0	
Response	
Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF	
Answer	No
Document Name	
Comment	
-Do not understand the meaning of the phrase “specific segment of a pipeline” for Footnote 3 (Generators with common fuel supply are all generators on a specific segment of a pipeline or multiple stations with a common fuel source. The fuel source should include pipelines, suppliers of consumable fuels, and variable sources like solar and wind energy.). Please clarify. -Table 1. Near-Term OPERA Scenarios are to broad and time-consuming from a resource perspective (e.g., computing power) to obtain an effective outcome. Additionally, this effort appears to be somewhat duplicative of other resource adequacy efforts.	
Likes 0	
Dislikes 0	
Response	
Nikki Carson-Marquis - Minnkota Power Cooperative Inc. - 1 - MRO	
Answer	No
Document Name	
Comment	
Minnkota Power Cooperative supports comments by the MRO New Standards Review Forum (MRO NSRF) and ACES.	
Likes 0	
Dislikes 0	
Response	
Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO	

Answer	No
Document Name	
Comment	
Some discussions regarding to the contingency event for “Fuel supply interruption that results in the loss of at least 50% of the largest subset of supply resources” might be not true for hydronic commany. But the group members discussed “drought condition” or “frazil ice” might cause the scenario but very rare. Do we want to do the OPERA under very rare system conditions as a normal practice or each BA can select and choose its own OPERA’s scenarios? MH also supports MRO NSRF’s vote and comments for this one.	
Likes 0	
Dislikes 0	
Response	
Jason Snodgrass - Georgia System Operations Corporation - 3 - SERC	
Answer	No
Document Name	
Comment	
GSOC does not agree with the specific scenarios described in Table 1. GSOC is supportive of the alternate language being submitted by Southern Company.	
Likes 0	
Dislikes 0	
Response	
Leslie Burke - Southern Company - Southern Company Generation - 5,6, Group Name Southern Company	
Answer	No
Document Name	
Comment	
Southern Company supports the EEI comments and disagrees with the language in the standard concerning the development scenarios and the inclusion of Table 1 along with requirements to implement a mitigation process.	
Likes 0	
Dislikes 0	
Response	

Keith Jonassen - ISO New England, Inc. - 2 - NPCC	
Answer	No
Document Name	
Comment	

ISO-NE believes that each BA should be able to determine its own Near-Term Opera Study Scenarios. Recommend utilizing the Table in the Technical Rationale or Implementation Guidance Document.

Recommended Edits to R2:

R2. Each Balancing Authority shall develop, document, and maintain a set of Reliability Coordinator-reviewed Near-Term OPERA scenarios or a method of scenario development. [Violation Risk Factor:] [Time Horizon: Operations Planning]

2.1. The Near-Term OPERA scenarios developed shall include:

2.1.1. The scenarios listed in Table 1; and

2.1.2. Scenarios with a likely risk of occurring within the Near-Term OPERA Study Period, which may include;

• seasonally appropriate historical events;

• generation specific fuel or energy contingency scenarios;

• consideration of wind and solar performance, and;

• weather events.

2.2. All Near-Term OPERA scenarios developed in R2.1 shall have documented criteria which specify when the implementation of an Operating Process is required.

ISO-NE will submit a redline version of TOP-0XX-X in the response for Question #13

Likes 0	
Dislikes 0	
Response	

David Jendras Sr - Ameren - Ameren Services - 1,3,6	
Answer	No
Document Name	
Comment	

Ameren agrees with and supports MISO's comments.

Likes 0	
Dislikes 0	

Response

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	No
Document Name	

Comment

EEI disagrees with the language in the proposed standard concerning the development scenarios and the inclusion of Table 1 along with the requirements to implement a mitigation process. EOP-011 already requires the Balancing Authority to develop RC-reviewed Operating Plans to mitigate Energy Emergencies and covers all timeframes such that there are no gaps. See EOP-011-4, R2 below along with the time horizons of applicability. Additionally, the Balancing Authority does not have authority to mitigate a projected energy shortage. For instance, the Balancing Authority cannot procure transmission service, contract for generations, require fuel deliveries, etc.

EOP-011-4

R2. Each Balancing Authority shall develop, maintain, and implement one or more Reliability Coordinator-reviewed **Operating Plan(s)** to mitigate Capacity Emergencies and Energy Emergencies within its Balancing Authority Area. The Operating Plan(s) shall include the following, as applicable: *[Violation Risk Factor: High] [**Time Horizon: Real-Time Operations, Operations Planning,** Long-term Planning**]***

EEI also believes that an Energy Reliability Assessment (ERA) should be designed to vary by region and that the Balancing Authority should have the flexibility to define the criteria. We also do not support the hypothetical scenarios which are included in Table 1 and do not think it should be part of the ERA's purpose, as these may cause confusion in priorities and result in unnecessary planning. This aligns with the following statement on page 4 of the SAR: "For energy reliability assessments, measurements and observations should be compared to predefined criteria, and results should be in terms of impact on the BES. The predefined criteria do not need to be specifically defined within the Standard. Instead, each entity will establish and document criteria as part of complying with the Standard."

To meet regional demands, Balancing Authorities must be provided with the flexibility to define their own scenarios based on regional operational experience. EEI suggests that ERA studies include general requirements for variations in generation, load, and fuel. This approach is needed to provide regional flexibility and prevent unintended consequences from responses to extreme-forecasted, low-probability scenarios while ensuring compliance with NERC operating requirements.

Likes 0	
Dislikes 0	

Response

Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5, Group Name BC Hydro	
Answer	No
Document Name	

Comment

A. As drafted, R2 Parts 2.1 and 2.2 appear to be a measure of compliance for R2. BC Hydro recommends reviewing and revising.

B. As drafted, R2 allows an entity to have a method of scenario development or a list of scenarios. With this allowance, it is unclear how this Requirement can be enforced (or the subsequent Requirements that reference scenarios) should an entity choose to only have a method of scenario development. BC Hydro recommends reviewing and revising R2 and subsequent Requirements to align with an entity choosing the option of having a method instead of specific scenarios.

C. BC Hydro recommends that the Near-Term OPERA scenarios development should be part of the process in R1.

D. The use of “Reliability Coordinator-reviewed” language in R2 appears to establish a requirement for the RC to review the BA’s scenarios/method to develop as part of the BA’s compliance for R2 ie the BA’s scenarios/method would be found non-compliant per R2 if the RC hadn’t reviewed it. As there are specific Requirements for the BA to submit R2 scenarios/method of development to the RC in R3, BC Hydro suggests that this is not required and recommends revising R1 wording to remove this language.

E. The use of “likely” in Part 2.1.2 makes the requirement ambiguous. Recommend revising to remove the word “likely” and include wording that allows the applicable entity to determine which scenarios, if any, to include.

F. BC Hydro notes that other Standards (including BAL-002-3 R2, EOP-010-1 R3, etc.) reference Operating Process. Does R2 Part 2.2 imply that all Operating Processes as developed under other Standards need to be reviewed and included if applicable?

Likes 0	
Dislikes 0	

Response

Harishkumar Subramani Vijay Kumar - Independent Electricity System Operator - 2, Group Name IRC SRC

Answer	No
Document Name	

Comment

The fuel contingency scenarios listed in Table 1 are broad enough that the SRC is concerned that these contingencies would result in a forecasted EEA2 or EEA3 a disproportionate amount of the time. For example, a contingency that includes loss of 50% of all solar generation on a clear, hot Texas day would likely result in a forecasted EEA2 or EEA3 for ERCOT a significant portion of the time, as would a contingency that includes loss of 50% of all wind generation under certain operating conditions. The SRC recommends that the fuel contingency scenarios be scaled back to minimize the number of false positives likely to result from studying these scenarios. It is also unclear how broadly the term “resources sharing a common fuel supply” is intended to be construed. For example, would all coal Resources that receive deliveries from the same railroad line or the same coal mine be considered to share a common fuel supply? Would all hydroelectric Resources on a given waterway or in a given region be considered to share a common fuel supply? Under what circumstances would nuclear Resources be considered to share a common fuel supply? The SRC recommends that the scope of this term be clarified and narrowed to address these ambiguities. Additionally, Table 1 is overly prescriptive, even dictating the level of supply interruption, i.e., 50%, to be considered. To the extent TOP-XXX requires BAs to consider factors such as fuel supply and inventory, consumable fuels, environmental constraints, emission limits, etc., in preparing its OPERA, TOP-XXX must also include a corresponding requirement for Generator Operators (GOP) and other registered entities to provide the BA with this data over the time horizon required for the BAs to construct compliant contingencies and otherwise fulfill their obligations under the standard. Recommendation: Alternatively, let the OPERA process (or methodology) dictate the process and scenarios to be studied. This would eliminate the need for Table 1 in the standard. Consider assigning the development of the OPERA process (or methodology) to the RC with a corresponding requirement for BAs and TOPs to follow the RC’s process. This would ensure consistency and coordination in an efficient manner.

Likes 0	
Dislikes 0	

Response

Casey Perry - PNM Resources - 1,3 - WECC,Texas RE

Answer	No
Document Name	

Comment

PNMR agrees with EEI's comments regarding Near-Term OPERA Scenarios:

The language in R2.2 does not align with the intent of this requirement. While R2.2 specifies that an Operating Process is required, there is no specific mention that the Operating Process is intended to mitigate issues identified as BPS risks or what constitutes an Operating Process mitigation. To address this concern, we offer the following proposed changes in bold face below):

2.2. All Near-Term OPERA scenarios developed in R2.1 shall have documented criteria which specify when implementing a**n mitigation** Operating Process **solution** is required.

Likes 0	
Dislikes 0	

Response

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

Answer	No
Document Name	

Comment

AZPS does not agree with the language in this requirement. The EOP-011 requirements already cover the intended outcomes of this proposed requirement.

Likes 0	
Dislikes 0	

Response

Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2

Answer	No
Document Name	

Comment	
ERCOT joins the comments submitted by the IRC SRC and adopts them as its own.	
Likes 0	
Dislikes 0	
Response	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators	
Answer	No
Document Name	
Comment	
We believe that Requirement 2.1.2 is too ambiguous. How is an auditor to assess a “likely risk of occurring”? How much of a risk is “likely” enough for it to be considered in the Near-Term OPREA scenarios? We recommend giving the BA an appropriate amount of discretion in determining whether a given scenario should be considered without the burden of proving its likelihood of occurring. To accomplish this objective, we recommend deleting Requirement 2.1.2 and modifying Requirement 2.1 as follows: “The Near-Term OPERA scenarios developed shall, at a minimum, include:”	
Likes 0	
Dislikes 0	
Response	
Alan Kloster - Evergy - 1,3,5,6 - MRO	
Answer	No
Document Name	
Comment	
Evergy supports and incorporates by reference the comments of the Edison Electric Institute for questions #5.	
Likes 0	
Dislikes 0	
Response	
Tim Kelley - Sacramento Municipal Utility District - 1,3,4,5,6 - WECC, Group Name SMUD	
Answer	No

Document Name	
Comment	
Every BA/Load Serve Entity has different situations. TOP-002 has already defined the elements a BA should consider. There is no need to define anything new.	
Likes 0	
Dislikes 0	
Response	
Michael Goggin - Grid Strategies - 6 - NA - Not Applicable	
Answer	No
Document Name	
Comment	
The two fuel supply contingency scenarios call for modeling "the loss of at least 50% of the largest subset of supply resources sharing a common fuel supply ... for the duration of the study period." Applying that assumption to wind or solar output may not make sense for several reasons. First, the capacity accreditation for wind and solar resources that determines the level of output that is relied on for meeting demand during peak periods, as calculated using an Effective Load Carrying Capability analysis or similar method, is typically significantly lower than their nameplate capacity. As a result, it is not clear whether the determination of the "largest subset of supply resources" and application of.the 50% loss assumption should be based on the nameplate capacity or the accredited capacity value of the resource. The determination of the "largest subset of supply resources" should presumably be based on the accredited capacity value as that is the expected level of output during peak periods, but applying the 50% loss to the accredited capacity value of those resources may double count risk that was already accounted for in the capacity accreditation analysis. Finally, assuming the 50% loss persists "for the duration of the study period" does not reflect the typical performance of wind and solar resources, as lulls in output typically only persist for hours, or days in rare cases. For studies extending out less than a week from real-time, wind and solar output forecasts could likely also be used as an input into the analysis.	
Likes 0	
Dislikes 0	
Response	
Lindsay Wickizer - Berkshire Hathaway - PacifiCorp - 6	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC	
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	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	
Document Name	
Comment	
Texas RE inquires as to why Requirement R2 requires Near-Term OPERA scenarios or simply a method to develop scenarios. This makes developing the actual scenarios seem optional. If the BA chooses the latter, Requirement Part 2.1 would not be applicable. In Requirement R2.2, Table 1 already specifies when an Operation Process is required. Texas RE recommends the SDT clarify Table 1 Footnotes 3 and 4 for Solar and Wind resources. For example, for a solar farm, would half of the panels need to be covered by clouds? Or would it be 50% in a specific county? Texas RE noticed that “study period” should be capitalized in Table 1 as it is proposed to be defined.	

Likes 0	
Dislikes 0	
Response	

6. Balancing Authority (BA) Requirements: The proposed Requirements 3, 4 and 5 are modeled after Requirements 2, 3 and 4 in EOP-011-2 to ensure that an individual BA's Near-Term OPERA processes are reviewed by the Reliability Coordinator (RC) based on compatibility and inter-dependency with other BA's Near-Term OPERA processes and scenarios, and have the BA address reliability risks identified by the RC. Do you agree that the requirements for the BA to have its processes reviewed by the RC and any RC-identified issues be addressed by the BA are reasonable?

Tim Kelley - Sacramento Municipal Utility District - 1,3,4,5,6 - WECC, Group Name SMUD

Answer	No
Document Name	

Comment

This adds an unnecessary burden to both BAs and RCs.

Likes 0	
Dislikes 0	

Response

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

Answer	No
Document Name	

Comment

Evergy supports and incorporates by reference the comments of the Edison Electric Institute for questions #6.

Likes 0	
Dislikes 0	

Response

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

Answer	No
Document Name	

Comment

We agree with the overall concept of the RC reviewing the Near-Term OPERA process and scenarios; however, we have concerns with the burden being placed upon the RC. To date, there are 5 specific requirements that require the RC to review documents created and submitted by an external entity. Most of the reviews required by the various Reliability Standards (3 out of 5) require the RC to review and respond to the submitting entity within

30 calendar days of receipt. If approved as currently written, the proposed Requirement R3 would increase the total number of reviews required to be completed within 30 calendar days to 4 out of 6 total.

Given that the proposed Requirement R3 is an annual review, we recommend giving the RC more time to perform its review. We believe that 90 calendar days is a more appropriate timeframe for the RC review; particularly considering that R4.1 requires the RC to consider compatibility with other BAs Near-Term OPERA process and scenarios.

Lastly, proposed Requirements 4.3 and R5 seem to contradict one another. Is the BA required to revise and resubmit its Operating Process(s) and scenarios to the RC within 30 days of receipt (R5) or as prescribed by the RC (R4.3)? We recommend modifying Requirement 4.3 as follows:

“Notify each Balancing Authority of the results of its review.”

Likes 0	
Dislikes 0	

Response

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

Answer	No
Document Name	

Comment

AZPS does agree that Operating Processes should be reviewed by the RC, the EOP-011 requirements already cover the intended outcomes of this proposed requirement.

Likes 0	
Dislikes 0	

Response

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

Answer	No
Document Name	

Comment

A. R4 Part 4.1: It is not clear whether the “other Balancing Authorities” are within the RC footprint. If the RC is expected to directly engage with BAs outside its own footprint, this would expand the scope of R1 and R2 expectations and the RC review requirements. BC Hydro recommends revising the language to clarify that it is the other BAs in the RC footprint.

B. It is not clear what data, if any, would need to be provided by the BA to the RC along with its process and scenarios/method. It is not clear if an RC can ask for further information from the BA. And it is not clear once the RC has completed their review, what, beyond the results, will be shared between the BA(s) and RC(s). It is not clear if the base case data listed in R1 will be passed along to RC and if it’s a method of scenario development an entity has chosen, only the method or scenarios or further scenario data per R2 would be passed to the RC. There does not seem like there is a need to share this info or data with other BAs or RCs. Should this need exist, BC Hydro recommends that data sharing agreements would be required to enable

the exchange of relevant information. BC Hydro recommends revising R3 and R4 to clarify what is being submitted by the BA to the RC and what an RC could potentially be requesting of the BA.

C. Requirement R5 references “resubmit its Operating Process(s)”. This appears to be a typo and R5 should be referring to Near-Term OPERA process. As well, R4.3 specifies that the RC can specify any timeframe for resubmittal and R5 specifies a 30 calendar day timeframe. If the RC specifies a timeframe longer than 30 calendar days, then these two Requirements would seem to conflict. BC Hydro recommends revising R5 to be “to its Reliability Coordinator within the timeframe specified in R4.3.”

Likes 0	
Dislikes 0	

Response

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

Answer	No
Document Name	

Comment

While EEI agrees that the RC should review the BA Operating Process proposed in the draft language provided by EEI, the RC review should be structured to be less restrictive than the review in EOP-011. In EOP-011, the RC is reviewing Operating Plans to mitigate actual emergencies, which is a reliability issue; conversely, in this standard, the RC is reviewing an Operating Process for forecasted emergencies.

Likes 0	
Dislikes 0	

Response

David Jendras Sr - Ameren - Ameren Services - 1,3,6

Answer	No
Document Name	

Comment

Ameren agrees with and supports MISO's comments.

Likes 0	
Dislikes 0	

Response

Leslie Burke - Southern Company - Southern Company Generation - 5,6, Group Name Southern Company

Answer	No

Document Name	
Comment	
Southern Company supports the EEI comments and agrees that the RC should review the BA Operating Process, the RC review should be structured to be less restrictive than the review in EOP-011.	
Likes 0	
Dislikes 0	
Response	
Jason Snodgrass - Georgia System Operations Corporation - 3 - SERC	
Answer	No
Document Name	
Comment	
GSOC agrees with the general concepts expressed in Requirements 3 – 5, but not the specific language. GSOC is supportive of the alternate language being submitted by Southern Company.	
Likes 0	
Dislikes 0	
Response	
Nikki Carson-Marquis - Minnkota Power Cooperative Inc. - 1 - MRO	
Answer	No
Document Name	
Comment	
Minnkota Power Cooperative supports comments by the MRO New Standards Review Forum (MRO NSRF) and ACES.	
Likes 0	
Dislikes 0	
Response	
Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF	
Answer	No
Document Name	

Comment
-Suggest changing: R3. The Balancing Authority shall submit for review the Near-Term OPERA process and scenarios to the Reliability Coordinator annually on a mutually-agreed upon schedule. to read: R3. The Balancing Authority shall submit for review the Near-Term OPERA process “developed under R1” and scenarios “developed under R2” to the Reliability Coordinator annually on a mutually-agreed upon schedule. -Amend: R5. Each Balancing Authority shall address any reliability risks identified by its Reliability Coordinator pursuant to Requirement R4 and resubmit its “Near-Term OPERA processes” and scenarios to its Reliability Coordinator within 30 calendar days of receipt.

Likes 0	
Dislikes 0	

Response

Jennie Wike - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6 - WECC, Group Name Tacoma Power

Answer	No
Document Name	

Comment
Tacoma Power supports the MRO NSRF comments.

Likes 0	
Dislikes 0	

Response

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

Answer	No
Document Name	

Comment
Consider assigning the development of the OPERA process (or methodology) to the RC and a corresponding requirement on BAs and TOPs to follow the RC’s process **System Operating Limits Methodology for the Operations Horizon** (**FAC-011-4, R9**). This would ensure consistency and coordination in an efficient manner and eliminate the need for RC review.

Likes 0	
Dislikes 0	

Response

Lindsay Wickizer - Berkshire Hathaway - PacifiCorp - 6

Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Casey Perry - PNM Resources - 1,3 - WECC,Texas RE	
Answer	Yes
Document Name	
Comment	
PNMR agrees with EEI in support of the approach to have BA Near-Term OPERA processes reviewed by the RC based on compatibility and inter-dependency with other BA's Near-Term OPERA processes and scenarios, and have the BA address reliability risks identified by the RC.	
Likes 0	
Dislikes 0	
Response	
Keith Jonassen - ISO New England, Inc. - 2 - NPCC	
Answer	Yes
Document Name	
Comment	
Suggested Minor edits to simplify R3: **R3.** The Balancing Authority shall review and submit the Near-Term OPERA process and scenarios to its Reliability Coordinator at least annually. ISO-NE will submit a redline version of TOP-0XX-X in the response for Question #13	
Likes 0	
Dislikes 0	
Response	
Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO	

Answer	Yes
Document Name	
Comment	
We agreed the BA should submit OPERA process and scenarios to its RC on a mutually-agreed upon schedule (for example annually) and address any relaiibity risks identified by its RC within 30 calendar days receipt.	
Likes 0	
Dislikes 0	
Response	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Harishkumar Subramani Vijay Kumar - Independent Electricity System Operator - 2, Group Name IRC SRC	
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	
Hillary Creurer - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ben Hammer - Western Area Power Administration - 1,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	
Document Name	
Comment	
Texas RE recommends the SDT clarify who develops the “mutually agreed-upon schedule” in Requirement R3. Texas RE recommends the SDT clarify which process and scenarios Requirement R3 and Requirement R5 refers to. If it is the process and scenarios in R1 and R2, it should state that.	
Likes 0	
Dislikes 0	
Response	

7. Balancing Authority notifies the RC within 24 hours of identified forecasted Energy Emergencies: Once the Near-Term OPERA has been performed, per the RC reviewed Operating Process, R6 requires the BA to notify its RC within 24 hours of any identified forecasted Energy Emergencies. The 24 hours notification to the RC of all forecasted Energy Emergency provides time for the BA to prepare and respond to the forecasted Energy Emergency. Do you agree that the BA must notify the RC within 24 hours? If not, please comment what would be more appropriate and explain why.

Sean Steffensen - IDACORP - Idaho Power Company - 1	
Answer	No
Document Name	
Comment	

Is the intent that the entity notify the RC of potential forecasted EEAs under any of the scenarios? In other words, even a single scenario identifying a possible EEA would trigger this requirement? Depending on the time period over which the OPERAs are conducted (and whether, in the normal course of business, alternative supply has been sought/procured yet) this may be overinclusive. An alternative might be, that if a possible EEA is identified for a future time period, the entity be given the opportunity to take mitigation action, including procuring additional supply. Given that the OPERA could be looking a month or more out, it is appropriate for the entity to have a chance to remediate any potential deficits.

Likes 0	
Dislikes 0	
Response	

Jason Snodgrass - Georgia System Operations Corporation - 3 - SERC	
Answer	No
Document Name	
Comment	

GSOC agrees that the BA should notifty its RC of any reliability issues, but not the specific language as written. GSOC is supportive of the alternate language being submitted by Southern Company.

Likes 0	
Dislikes 0	
Response	

Leslie Burke - Southern Company - Southern Company Generation - 5,6, Group Name Southern Company	
Answer	No
Document Name	
Comment	

Southern Company supports the EEI comments and agrees that the results of an ERA should only be provided to the RC upon identification of a reliability issue.

Likes 0	
Dislikes 0	

Response

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

Answer	No
Document Name	

Comment

While EEI does agree that an ERA should be performed as specified, the results should only be provided to the RC upon identification of a reliability issue. Current TOP-002-5 already requires the BA to provide a next-day Operating Plan to the RC which contains information about potential energy emergencies (R7), and the BA notifies the RC when its Emergency Operating Plan is implemented as required in EOP-011 (R5). These notifications are necessary to ensure reliability; however, we do not agree with the time requirement in R6. The 24-hour requirement in R6 puts this type of communication on par with actual Emergencies and is unnecessary for BES reliability.

Likes 0	
Dislikes 0	

Response

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

Answer	No
Document Name	

Comment

This requirement seems to overlap with the existing TOP-002-4 Requirements R4 and R7. BC Hydro suggest that there is not enough technical justification for such new requirements as drafted, and would duplicate existing Requirements.

Likes 0	
Dislikes 0	

Response

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

Answer	No
Document Name	

Comment
AZPS does agree the ERA should be performed and provided to the RC, but TOP-002/EOP-011 already cover the intended outcomes of this proposed requirement. The 24 hour requirement in R6 puts this type of communication on par with actual Emergencies and does not increase reliability.

Likes 0	
Dislikes 0	

Response

Alan Kloster - Evergy - 1,3,5,6 - MRO	
Answer	No
Document Name	

Comment
Evergy supports and incorporates by reference the comments of the Edison Electric Institute for questions #7.

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 supports a 24-hour notification provision for situational awareness; however, what is done following notification should dovetail with existing standards (TOP-002, TOP-001 and EOP-011) and not introduce new steps that aren't a value-add over existing processes.

Likes 0	
Dislikes 0	

Response

Jennie Wike - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6 - WECC, Group Name Tacoma Power	
Answer	Yes
Document Name	

Comment

Tacoma Power supports the MRO NSRF comments.

Likes 0	
Dislikes 0	

Response

Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF

Answer	Yes
Document Name	

Comment

-Amend: 6.1. The Balancing Authority shall notify its Reliability Coordinator within 24 hours “of determining that the criteria developed under R2.2” when Near-Term OPERA results require the implementation of an Operating Process(es).

Likes 0	
Dislikes 0	

Response

Nikki Carson-Marquis - Minnkota Power Cooperative Inc. - 1 - MRO

Answer	Yes
Document Name	

Comment

Minnkota Power Cooperative supports comments by the MRO New Standards Review Forum (MRO NSRF) and ACES.

Likes 0	
Dislikes 0	

Response

Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO

Answer	Yes
Document Name	

Comment

MH supports MRO NSRF’s vote and comments for this one.

Likes 0	
Dislikes 0	
Response	
Keith Jonassen - ISO New England, Inc. - 2 - NPCC	
Answer	Yes
Document Name	
Comment	
The Requirements in R6 needs to be clear as to what the Operating Process(es) are. As currently written any operating process such as normal dispatch and controls may be required in the notification process. Suggested Edit for 6.1: **6.1.** {C}The Balancing Authority shall notify its Reliability Coordinator within 24 hours when Near-Term OPERA results identify a forecasted Energy Emergency. ISO-NE will submit a redline version of TOP-0XX-X in the response for Question #13	
Likes 0	
Dislikes 0	
Response	
David Jendras Sr - Ameren - Ameren Services - 1,3,6	
Answer	Yes
Document Name	
Comment	
Ameren agrees with and supports MISO's comments.	
Likes 0	
Dislikes 0	
Response	
Harishkumar Subramani Vijay Kumar - Independent Electricity System Operator - 2, Group Name IRC SRC	
Answer	Yes

Document Name	
Comment	
The SRC supports a 24-hour notification provision for situational awareness; however, what is done following notification should dovetail with existing standards (TOP-002, TOP-001 and EOP-011) and not introduce new steps that aren't a value-add over existing processes.	
Likes 0	
Dislikes 0	
Response	
Casey Perry - PNM Resources - 1,3 - WECC,Texas RE	
Answer	Yes
Document Name	
Comment	
PNMR agrees with obligating the BA to notify the RC of an identified forecasted Energy Emergency, but it is unclear whether the SDT will similarly modify EOP-011-1 to align the Energy Emergency Alert obligations contained in that Reliability Standard with the obligations being set within the proposed TOP Reliability Standard.	
Likes 0	
Dislikes 0	
Response	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
ERCOT joins the comments submitted by the IRC SRC and adopts them as its own.	
Likes 0	
Dislikes 0	
Response	
Tim Kelley - Sacramento Municipal Utility District - 1,3,4,5,6 - WECC, Group Name SMUD	
Answer	Yes
Document Name	

Comment	
It is necessary to notify the RC if a BA forecasts any Energy Emergency. However, it should be within 24 hours after the conditions are confirmed, and not simply identified, because it will take some time for a BA to confirm and verify that the forecasted conditions are accurate.	
Likes 0	
Dislikes 0	
Response	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ben Hammer - Western Area Power Administration - 1,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Hillary Creurer - Allete - Minnesota Power, Inc. - 1	
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	
Lindsay Wickizer - Berkshire Hathaway - PacifiCorp - 6	
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 Collaborators	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	

Document Name	
Comment	
Texas RE noticed that the verbiage of the question does not match the verbiage of Requirement R6. The question refers to notifying the RC within 24 hours of any identified forecasted Energy Emergencies. The standard states that the RC shall be notified when the Near-Term OPERA results require the implementation of an Operating Process. Not all Energy Emergencies require an Operating Process. Texas RE encourages the SDT to reevaluate its use of the terms Operating Process and Operating Plan. EOP-011-2 uses the term Operating Plan, while drafted TOP-0XX-X Requirement Part R2.2 requires a that Near-Term OPERA scenarios have criteria to specified when implementing and Operating Process is required. EOP-011-2 does not require every Energy Emergency Alert scenario to have an Operating Plan, which is what TOP-0XX-X table seems to suggest. This could cause confusion as entities implement these standards.	
Likes 0	
Dislikes 0	
Response	

8. Submit the Near-Term OPERA results to the RC upon request: The requirement to submit the results to the RC upon request is intended to ensure the RC can review the assessment results. This requirement ensures the RC can review the results to verify the processes and scenarios are being implemented and to review any adverse results. Do you agree that the results must be submitted to the RC upon request, for RC review? If not, please comment which would be more accurate and explain why.

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

Answer	No
Document Name	

Comment

This Requirement seems to overlap the existing TOP-002-4 R4/R7. BC Hydro suggest that there is not enough technical justification for such new requirements as drafted and would duplicate existing Requirements.

Likes 0	
Dislikes 0	

Response

Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO

Answer	No
Document Name	

Comment

The assessment results should be forwarded to RC automatically or regularly bases same as the the next day OPA work process (for example Manitoba Hydro to MISO day ahead study work process).

Likes 0	
Dislikes 0	

Response

Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2

Answer	Yes
Document Name	

Comment

ERCOT joins the comments submitted by the IRC SRC and adopts them as its own.

Likes 0	

Dislikes 0	
Response	
Marcus Bortman - APS - Arizona Public Service Co. - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
AZPS agrees that results should be submitted to the RC upon request.	
Likes 0	
Dislikes 0	
Response	
Casey Perry - PNM Resources - 1,3 - WECC,Texas RE	
Answer	Yes
Document Name	
Comment	
PNMR agrees with the requirement to submit the results to the RC upon request.	
Likes 0	
Dislikes 0	
Response	
Harishkumar Subramani Vijay Kumar - Independent Electricity System Operator - 2, Group Name IRC SRC	
Answer	Yes
Document Name	
Comment	
R6 requires a specific notification, but it may also be beneficial for the BA to regularly share the results, similar to what is done under existing TOP standards.	
Likes 0	
Dislikes 0	
Response	

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI agrees with the requirement to submit the results to the RC upon request.	
Likes 0	
Dislikes 0	
Response	
David Jendras Sr - Ameren - Ameren Services - 1,3,6	
Answer	Yes
Document Name	
Comment	
Ameren agrees with and supports MISO's comments.	
Likes 0	
Dislikes 0	
Response	
Keith Jonassen - ISO New England, Inc. - 2 - NPCC	
Answer	Yes
Document Name	
Comment	
ISO-NE has no additional comments	
Likes 0	
Dislikes 0	
Response	
Leslie Burke - Southern Company - Southern Company Generation - 5,6, Group Name Southern Company	
Answer	Yes

Document Name	
Comment	
Southern Company supports the EEI comments and agrees with the requirement to submit the results to the RC upon request.	
Likes 0	
Dislikes 0	
Response	
Nikki Carson-Marquis - Minnkota Power Cooperative Inc. - 1 - MRO	
Answer	Yes
Document Name	
Comment	
Minnkota Power Cooperative supports comments by the MRO New Standards Review Forum (MRO NSRF) and ACES.	
Likes 0	
Dislikes 0	
Response	
Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF	
Answer	Yes
Document Name	
Comment	
None.	
Likes 0	
Dislikes 0	
Response	
Jennie Wike - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6 - WECC, Group Name Tacoma Power	
Answer	Yes
Document Name	
Comment	

Tacoma Power supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Kendra Buesgens - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	Yes
Document Name	
Comment	
A specific notification when required by R6, but why not regularly share the results similar to what is done under existing TOP standards. Each TOP/BA must notify other entities with a role in their respective plan(s) and provide their OPAs and Operating Plans to the RC; however, unlike EOP-011, TOP-002 does not require the RC to explicitly review, provide feedback and approval (*see* TOP-002-4, requirements R6-R7).	
Likes 0	
Dislikes 0	
Response	
Tim Kelley - Sacramento Municipal Utility District - 1,3,4,5,6 - WECC, Group Name SMUD	
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	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Lindsay Wickizer - Berkshire Hathaway - PacifiCorp - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jason Snodgrass - Georgia System Operations Corporation - 3 - SERC	
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	
Hillary Creurer - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ben Hammer - Western Area Power Administration - 1,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

9. Operating Process Development: The proposed Requirements 7, 8 and 9 are modeled after Requirements 2, 3 and 4 in EOP-011-2 to ensure that there is a plan developed to respond to deficiencies noted during the performance of a Near-Term OPERA. R7 is intended that Operating Processes would be developed before OPERAs are performed and would be a high-level plan of how a BA would approach a forecasted Energy Emergency, not necessarily a step-by-step process. R7 has required actions listed for consideration that are intended to reduce the risk of Energy Emergencies. As written, the requirement provides a list of optional steps to consider as part of an Operating Process. Should the list of requirements for Operating Processes be optional (as written), be required to be addressed for all BAs (as in EOP-011), or removed from R7 entirely? Please provide additional actions or notes which should not be included in this list as comments.

Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC	
Answer	The listed actions should be addressed by all BAs (as in EOP-011)
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Hillary Creurer - Allete - Minnesota Power, Inc. - 1	
Answer	The listed actions should be addressed by all BAs (as in EOP-011)
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	The listed actions should be addressed by all BAs (as in EOP-011)
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Casey Perry - PNM Resources - 1,3 - WECC,Texas RE	
Answer	The listed actions should be addressed by all BAs (as in EOP-011)
Document Name	
Comment	
PNMR agrees with EEI's commnet: While EEI agrees that all BAs should address all actions, consistent with EOP-011, the SDT should ensure that the emergency operating procedures contained in this proposed Reliability Standard are reviewed to ensure there is no duplication of requirements from EOP-011. EEI also ask for clarification regarding the intent of Requirement R9 RC reviews of the BA's Operating Processes in situations where the responsible RC is also the responsible BA.	
Likes 0	
Dislikes 0	
Response	
Ben Hammer - Western Area Power Administration - 1,6	
Answer	The listed actions should be options (as written)
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Sean Steffensen - IDACORP - Idaho Power Company - 1	
Answer	The listed actions should be options (as written)
Document Name	
Comment	
Existing EEA processes should suffice or count toward meeting this Operating Plan requirement. Likewise, RC review of EEA processes should count toward R8.	
Likes 0	
Dislikes 0	

Response	
Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF	
Answer	The listed actions should be options (as written)
Document Name	
Comment	
-R7.2 bullet three should be deleted as EOP-011 R2.2.2 governs when an EEA is requested. -R7.2.1. Provisions for operator-controlled manual Load shedding that minimizes the overlap with automatic Load shedding and are capable of being implemented in a timeframe adequate for mitigating the Emergency, should be deleted as EOP-011 R2.2.8 speficifically requires this to mitigate an Emergency. This requirement is not appropriate for a forecasted Emergency. -Delete: 7.2.2. Provisions to determine reliability impacts of: • cold weather conditions; and • extreme weather conditions. is not appropriate – the scenarios in Table 1 address the impacts of these weather conditions on energy resources and fuel supply. The implementation of the Near-Term OPERA process under R3 has already addressed this item.	
Likes 0	
Dislikes 0	
Response	
Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO	
Answer	The listed actions should be options (as written)
Document Name	
Comment	
We agreed the list actions should be options since each utility has its own situations and mitigations for forecasted energy emergincies. For example in Manitoba, we can run Brandon CTs or perform generation scheduling to mitigate.	
Likes 0	
Dislikes 0	
Response	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators	
Answer	The listed actions should be options (as written)

Document Name	
Comment	
We agree with the stated intent that the steps listed in R7 be optional; however, the current language in the proposed Requirement 7.2 seems to indicate that the identified processes are a minimally required list. We recommend modifying Requirement 7.2 as follows: “Processes to reduce the probability of forecasted Emergencies including, but not limited to, any or all of the optional actions identified below:”	
Likes 0	
Dislikes 0	
Response	
Kendra Buesgens - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	The listed actions should not be part of the Standard
Document Name	
Comment	
The listed actions are overly prescriptive, set a higher bar threshold for performance than existing TOP standards (TOP-002- and TOP-001) in a time horizon that is farther into the future and less certain than TOP-002 and TOP-001, leapfrogs existing TOP standards to move directly into emergency procedures and fails to acknowledge that operating plans (and forecasted risks) may change prior to the operating day. As written, TOP-XXX-X requires more time and effort to be dedicated to resolving identified risks in a multi-day look ahead as opposed to dedicating these same resources to addressing identified risks in time horizons nearer to real-time. In addition, the duplication of EOP-011 requirements in TOP-XXX-X introduces the opportunity for “double jeopardy.” As the implementation of these requirements is already covered under EOP-011, R2, there is no need to repeat them here. If EOP-011 is not working as desired, modifications should be made in EOP-011.	
Likes 0	
Dislikes 0	
Response	
Jennie Wike - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6 - WECC, Group Name Tacoma Power	
Answer	The listed actions should not be part of the Standard
Document Name	
Comment	
Tacoma Power supports the MRO NSRF comments.	
Likes 0	

Dislikes 0	
Response	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	The listed actions should not be part of the Standard
Document Name	
Comment	
BPA recommends R7 be removed. R7 is duplicative of EOP-011-2 since a BA should use their EOP-011-2 plan to ensure consistency in the operations horizon. If the SDT is envisioning something different than that plan, please clarify. If R7 is removed, R8 and R9 would also be removed.	
Likes 0	
Dislikes 0	
Response	
Nikki Carson-Marquis - Minnkota Power Cooperative Inc. - 1 - MRO	
Answer	The listed actions should not be part of the Standard
Document Name	
Comment	
Minnkota Power Cooperative supports comments by the MRO New Standards Review Forum (MRO NSRF) and ACES.	
Likes 0	
Dislikes 0	
Response	
Jason Snodgrass - Georgia System Operations Corporation - 3 - SERC	
Answer	The listed actions should not be part of the Standard
Document Name	
Comment	
GSOC is supportive of the alternate language being submitted by Southern Company.	
Likes 0	
Dislikes 0	
Response	

Leslie Burke - Southern Company - Southern Company Generation - 5,6, Group Name Southern Company	
Answer	The listed actions should not be part of the Standard
Document Name	
Comment	
Southern Company supports the EEI comments and does **not** agree with Requirements 7, 8 and 9 as written.	
Likes 0	
Dislikes 0	
Response	
Keith Jonassen - ISO New England, Inc. - 2 - NPCC	
Answer	The listed actions should not be part of the Standard
Document Name	
Comment	
This is a duplicative requirement to EOP-011-2 R2. Suggest a Requirement modeled after FAC-011-3 R3.3 which references FAC-014 Requirement 6. While certainly not common there is precedent for this type of reference. Additionally the below proposed edit would encorporate the specific item not addressed by EOP-011 R2. Suggested R7 Edit: **R7** Each BA shall develop and maintain one or more Reliability Coordinator reviewed Operating Process(es) to mitigate forecasted Energy Emergencies within its Balancing Authority Area (in accordance with EOP-011 Requirements applicable to the Balancing Authority). **R7.1** Forecasted Energy Emergency Operating Processes shall include (in addition to those prescribed in EOP-011 Requirement 2): -Updated frequency of performing a Near-Term OPERA to monitor if an Energy Emergency Alert continues to be forecasted or forecasted conditions worsen. ISO-NE is submitting a redline version of TOP-0XX in its response to Question 13.	
Likes 0	
Dislikes 0	
Response	
David Jendras Sr - Ameren - Ameren Services - 1,3,6	
Answer	The listed actions should not be part of the Standard

Document Name	
Comment	
Ameren agrees with and supports MISO's comments.	
Likes 0	
Dislikes 0	
Response	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	The listed actions should not be part of the Standard
Document Name	
Comment	
EEI does not support Requirements 7, 8 and 9 as written. Instead, EEI suggests requirements that require the development of an Operating Process that contains the information around performance of the ERA. We additionally note, in our other comments, that existing standards are already in place to deal with the identification, communication, and mitigation of actual Emergencies. The ERA should be limited to an assessment that provides awareness for others (as necessary per regional needs and is useful to enhance reliability consistent with roles), responsibilities, and capabilities of the applicable NERC registered entities. We are also concerned that the language contained in R7-R9 appears to be duplicative of EOP-011 and therefore inconsistent with the purpose of this proposed Reliability Standard and would only serve to create confusion.	
Likes 0	
Dislikes 0	
Response	
Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5, Group Name BC Hydro	
Answer	The listed actions should not be part of the Standard
Document Name	
Comment	
Based on BC Hydro’s understanding of the reliability need this proposed standard is trying to address, it would be adequately covered by EOP-011.	
Likes 0	
Dislikes 0	
Response	

Harishkumar Subramani Vijay Kumar - Independent Electricity System Operator - 2, Group Name IRC SRC	
Answer	The listed actions should not be part of the Standard
Document Name	
Comment	
Including optional steps in a mandatory Reliability Standard has a high risk of causing confusion and diminishing the auditability and enforceability of the standard. For clarity, the SRC recommends that all optional steps be removed from the standard and placed in a non-binding document, such as the technical rationale or implementation guidance. The listed actions are overly prescriptive, set a higher threshold for performance than existing TOP standards (TOP-002- and TOP-001) in a time horizon that is farther into the future and less certain than TOP-002 and TOP-001, leapfrog existing TOP standards to move directly into emergency procedures, and fail to acknowledge that operating plans (and forecasted risks) may change prior to the operating day. As written, TOP-XXX-X requires more time and effort to be dedicated to resolving identified risks in a multi-day look ahead instead of dedicating these same resources to addressing identified risks in time horizons nearer to real-time. In addition, the duplication of EOP-011 requirements in TOP-XXX-X introduces the opportunity for “double jeopardy.” As the implementation of these requirements is already covered under EOP-011, R2, there is no need to repeat them here. If EOP-011 is not working as desired, modifications should be made in EOP-011.	
Likes 0	
Dislikes 0	
Response	
Lindsay Wickizer - Berkshire Hathaway - PacifiCorp - 6	
Answer	The listed actions should not be part of the Standard
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Marcus Bortman - APS - Arizona Public Service Co. - 1,3,5,6	
Answer	The listed actions should not be part of the Standard
Document Name	
Comment	
AZPS agrees that all BAs should address all actions, consistent with EOP-011, the SDT should ensure that the emergency operating procedures contained in this proposed Reliability Standard are reviewed to ensure there is no duplication of requirements from EOP-011.	
Likes 0	
Dislikes 0	
Response	

Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	The listed actions should not be part of the Standard
Document Name	
Comment	
ERCOT joins the comments submitted by the IRC SRC and adopts them as its own.	
Likes 0	
Dislikes 0	
Response	
Alan Kloster - Evergy - 1,3,5,6 - MRO	
Answer	The listed actions should not be part of the Standard
Document Name	
Comment	
Evergy supports and incorporates by reference the comments of the Edison Electric Institute for questions #9.	
Likes 0	
Dislikes 0	
Response	
Tim Kelley - Sacramento Municipal Utility District - 1,3,4,5,6 - WECC, Group Name SMUD	
Answer	The listed actions should not be part of the Standard
Document Name	
Comment	
These are already included in EOP-011.	
Likes 0	
Dislikes 0	
Response	

10. Operating Process Development: The requirement is intended to ensure that there is a plan developed to respond to deficiencies noted during the performance of a Near-Term OPERA. While there are multiple possible types of plans that could be developed (e.g., Operating Plan, Operating Process, Operating Procedure, Corrective Action Plan), the most relevant defined term for responding to a forecasted Energy Emergency is Operating Process. Do you agree with the correct type of plan being an Operating Process? If not, please comment which would be more accurate and explain why.

Tim Kelley - Sacramento Municipal Utility District - 1,3,4,5,6 - WECC, Group Name SMUD	
Answer	No
Document Name	
Comment	
All the existing EOP and TOP standards use the term Operating Plan, which include the Operating Processes. There is no need to define a new term.	
Likes 0	
Dislikes 0	
Response	

Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	No
Document Name	
Comment	
ERCOT joins the comments submitted by the IRC SRC and adopts them as its own.	
Likes 0	
Dislikes 0	
Response	

Harishkumar Subramani Vijay Kumar - Independent Electricity System Operator - 2, Group Name IRC SRC	
Answer	No
Document Name	
Comment	
R1 appears to use process as a generic term for a type of business process and methodology. R7 uses the defined term Operating Process. The SRC recommends that a different term be used in R1 to avoid potential confusion. The SRC also notes that the definition of Operating Process indicates that an Operating Process includes options to be selected based on real-time conditions. This seems incongruous with the draft standard, which addresses a longer time horizon than real-time. Consequently, the SRC recommends that the SDT revisit the use of an Operating Plan instead of an Operating Process, as an Operating Plan could dovetail into the natural progression of existing standards: OPERAs (TOP-XXX-X), OPAs (TOP-002), RTAs (TOP-	

001) and emergency procedures (EOP-011). In this way, Operating Plans developed pursuant to the OPERA could roll forward and be modified as needed pursuant to TOP-002 Next Day OPA and Operating Plans and TOP-001 Real-Time Assessments (RTA) without having to “recreate the wheel.”

Likes 0	
Dislikes 0	

Response

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

Answer	No
Document Name	

Comment

BC Hydro recommends using the “Operating Plan” term to be in alignment with EOP-011 R2.

Likes 0	
Dislikes 0	

Response

David Jendras Sr - Ameren - Ameren Services - 1,3,6

Answer	No
Document Name	

Comment

Ameren agrees with and supports MISO's comments.

Likes 0	
Dislikes 0	

Response

Keith Jonassen - ISO New England, Inc. - 2 - NPCC

Answer	No
Document Name	

Comment

ISO-NE believes it should be specifically called out as a **forecasted Energy Emergency** since Operating Process is too vague.

ISO-NE is submitting a redline version of TOP-0XX in its response to Question 13.

Likes 0	
Dislikes 0	
Response	
Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO	
Answer	No
Document Name	
Comment	
The most relevant defined term is Operating Plan or Operating Procedure. The OPERA will initiate the studies to provide the mitigations and solutions to deal with the forecasted Energy Emergency. MH also supports MRO NSRF's vote and comments for this one.	
Likes 0	
Dislikes 0	
Response	
Nikki Carson-Marquis - Minnkota Power Cooperative Inc. - 1 - MRO	
Answer	No
Document Name	
Comment	
Minnkota Power Cooperative supports comments by the MRO New Standards Review Forum (MRO NSRF) and ACES.	
Likes 0	
Dislikes 0	
Response	
Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	No
Document Name	
Comment	
BPA believes Operating Plan is the appropriate term. BPA does not see significant distinction between the Operating Plan already required under EOP-011 and the plan requested in this standard.	

BPA would also like to note that the SDT has not differentiated between the terms process and plan in the standard and uses the terms seemingly interchangeably in this comment form. If the SDT envisions something different than the EOP-011 Operating Plan, the distinction needs to be made in the standard.	
Likes 0	
Dislikes 0	
Response	
Jennie Wike - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6 - WECC, Group Name Tacoma Power	
Answer	No
Document Name	
Comment	
Tacoma Power supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Kendra Buesgens - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	No
Document Name	
Comment	
It is not clear what the intent is for the review of the Operating Process in R10 and R11 since it introduces a second layer of RC submittal and review as that in R4 and R5. In addition, the timeframe appears to allow 30 calendar days for review and response by which time the Operating Process would have expired and a new one created. Where R1 uses Process to mean a type of business process and methodology, R7 calls Process something that is more like a mitigation plan or operating procedure. The two should be more distinct. In that regard, the SDT should revisit the use of an Operating Plan instead of using an “Operating Process” as this would dovetail into TOP-002 and the natural progression of existing standards: OPERAs (TOP-XXX-X), OPAs (TOP-002), RTAs (TOP-001) and emergency procedures (EOP-011). In this way, Operating Plans developed pursuant to the OPERA could roll-forward and be modified as needed pursuant to TOP-002 Next Day OPA and Operating Plans and TOP-001 Real-Time Assessments (RTA) without having to “recreate the wheel.”	
Likes 0	
Dislikes 0	

Response	
Lindsay Wickizer - Berkshire Hathaway - PacifiCorp - 6	
Answer	No
Document Name	
Comment	
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 Operating Process as the correct type of plan.	
Likes 0	
Dislikes 0	
Response	
Casey Perry - PNM Resources - 1,3 - WECC,Texas RE	
Answer	Yes
Document Name	
Comment	
PMNR agrees that the use of an Operating Process is the most appropriate plan to address a forecasted Energy Emergency.	
Likes 0	
Dislikes 0	
Response	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	

Answer	Yes
Document Name	
Comment	
EEI agrees that the use of an Operating Process is the most appropriate plan to address a forecasted Energy Emergency.	
Likes 0	
Dislikes 0	
Response	
Leslie Burke - Southern Company - Southern Company Generation - 5,6, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
Southern Company supports the EEI comments and agrees that the use of an Operating Process is the most appropriate plan to address a forecasted Energy Emergency.	
Likes 0	
Dislikes 0	
Response	
Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF	
Answer	Yes
Document Name	
Comment	
None.	
Likes 0	
Dislikes 0	
Response	
Alan Kloster - Evergy - 1,3,5,6 - MRO	
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 Collaborators	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jason Snodgrass - Georgia System Operations Corporation - 3 - SERC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Hillary Creurer - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Ben Hammer - Western Area Power Administration - 1,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

11. Address Risks Identified in the Review: R8 is intended to provide RCs with information that is needed to ensure that the plans address the reliability of the system. R9 is needed to ensure that any risk identified by the RC in R7 is mitigated by the BA. The SDT proposes that the BA addresses the risk in its Operating Plan and resubmits it to its RC. R10 requires the BA to revise the Operating Process that was previously reviewed by the RC and found to require modifications. Do you agree with the language in the requirements including the proposed timeframes? If not, please provide updated language in your comment as well as a basis for the recommendation.

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

Answer	No
Document Name	

Comment

It is not clear what the intent is for the review of the Operating Process in R10 and R11 since it introduces a second layer of RC submittal and review as that in R4. In addition, the timeframe appears to allow 30 calendar days by which time the Operating Process would have expired and a new one created.

Requirement R7 requires the RC to review and provide feedback on BA Operating Processes on what could be as frequent as a weekly basis. The support for this is cited as EOP-011; however the review process for EOP-011 typically involves the review of annual (and at worst case seasonal) plans. This sort of feedback loop is too administratively burdensome for near real-time operations where speed and nimbleness are critical.

In addition, as stated in our response to Question #9, there is no need to duplicate EOP-011 requirements in TOP-XXX-X. Reiterating requirements from EOP-011 introduces the opportunity for “double jeopardy.” If EOP-011 is not working as desired, modifications should be made in EOP-011.

Likes 0	
Dislikes 0	

Response

Jennie Wike - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6 - WECC, Group Name Tacoma Power

Answer	No
Document Name	

Comment

Tacoma Power supports the MRO NSRF comments.

Likes 0	
Dislikes 0	

Response

Sean Steffensen - IDACORP - Idaho Power Company - 1

Answer	No

Document Name	
Comment	
Existing EEA processes should suffice or count toward meeting this Operating Plan requirement. Likewise, RC review of EEA processes should count toward R8.	
Likes 0	
Dislikes 0	
Response	
Nikki Carson-Marquis - Minnkota Power Cooperative Inc. - 1 - MRO	
Answer	No
Document Name	
Comment	
Minnkota Power Cooperative supports comments by the MRO New Standards Review Forum (MRO NSRF) and ACES.	
Likes 0	
Dislikes 0	
Response	
Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO	
Answer	No
Document Name	
Comment	
The timeline is reasonable and the updated plan needs to be re-submitted from BA to RC. Since there are a few timelines in this TOP, it is better to clarify each timeline for BA and RC to ensure they are on the same page for OPERA. MH also supports MRO NSRF's vote and comments for this one.	
Likes 0	
Dislikes 0	
Response	
Jason Snodgrass - Georgia System Operations Corporation - 3 - SERC	
Answer	No
Document Name	

Comment	
GSOC is supportive of the alternate language being submitted by Southern Company.	
Likes 0	
Dislikes 0	
Response	
Leslie Burke - Southern Company - Southern Company Generation - 5,6, Group Name Southern Company	
Answer	No
Document Name	
Comment	
Southern Company supports the EEI comments and does **not** agree with the language in R7 that includes a timeframe for response.	
Likes 0	
Dislikes 0	
Response	
Keith Jonassen - ISO New England, Inc. - 2 - NPCC	
Answer	No
Document Name	
Comment	
As these requirements are duplicative to EOP-011 Requirements 3, 4, and 5. They should be removed from this Standard if R7 is modified to reflect the suggested changes in ISO-NE response to question 9. ISO-NE is submitting a redline version of TOP-0XX in its response to Question 13.	
Likes 0	
Dislikes 0	
Response	
David Jendras Sr - Ameren - Ameren Services - 1,3,6	
Answer	No
Document Name	

Comment	
Ameren agrees with and supports MISO's comments.	
Likes 0	
Dislikes 0	
Response	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	No
Document Name	
Comment	
EEI does not agree with the language in R7 that includes a timeframe for response. **See EEI's response to Question 9.**	
Likes 0	
Dislikes 0	
Response	
Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5, Group Name BC Hydro	
Answer	No
Document Name	
Comment	
Based on BC Hydro's understanding of the reliability need this proposed standard is trying to address, it would be adequately covered by other Requirements in already effective Standards.	
Likes 0	
Dislikes 0	
Response	
Harishkumar Subramani Vijay Kumar - Independent Electricity System Operator - 2, Group Name IRC SRC	
Answer	No
Document Name	
Comment	

Requirement R7 requires the RC to review and provide feedback on BA Operating Processes on what could be as frequent as a weekly basis. The support for this is cited as EOP-011; however the review process for EOP-011 typically involves the review of annual (and at worst case seasonal) plans. This sort of feedback loop is too administratively burdensome for near real-time operations where speed and nimbleness are critical. In addition, as stated in our response to Question #9, there is no need to duplicate EOP-011 requirements in TOP-XXX-X. Reiterating requirements from EOP-011 introduces the opportunity for “double jeopardy.” If EOP-011 is not working as desired, modifications should be made in EOP-011.	
Likes 0	
Dislikes 0	
Response	
Marcus Bortman - APS - Arizona Public Service Co. - 1,3,5,6	
Answer	No
Document Name	
Comment	
AZPS agrees that all BAs should address all actions, consistent with EOP-011, the SDT should ensure that the emergency operating procedures contained in this proposed Reliability Standard are reviewed to ensure there is no duplication of requirements from EOP-011.	
Likes 0	
Dislikes 0	
Response	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	No
Document Name	
Comment	
ERCOT joins the comments submitted by the IRC SRC and adopts them as its own.	
Likes 0	
Dislikes 0	
Response	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators	
Answer	No
Document Name	
Comment	

Our concerns for the proposed Requirements R8/R9/R10 are similar to those addressed above with regards to the proposed Requirements R3/R4/R5. To wit, we have serious concerns about the burden being placed upon the RC to coordinate, review, and respond to multiple plans, processes, and procedures from multiple different entities (BA, TOP, etc.) in this and other Reliability Standards. We recommend modifying Requirement R9 to be 90 calendar days as opposed to the currently proposed 30 calendar day requirement.

Additionally, like proposed Requirements 4.3 and R5, Requirements 9.2 and R10 seem to contradict one another. Is the BA required to revise and resubmit its Operating Process(s) andscenarios to the RC within 30 days of receipt (R10) or as prescribed by the RC (R9.2)? We recommend modifying Requirement 9.2 as follows:

“Notify each Balancing Authority of the results of its review.”

Lastly, we believe there is a typo in R10. As written, R10 states:

“Each Balancing Authority shall address any reliability risks identified by its Reliability Coordinator pursuant to Requirement R7…”

We believe the correct requirement to be referenced is R9 as this would be in alignment with the proposed language of R5.

Likes 0	
Dislikes 0	

Response

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

Answer	No
Document Name	

Comment

Evergy supports and incorporates by reference the comments of the Edison Electric Institute for questions #11.

Likes 0	
Dislikes 0	

Response

Tim Kelley - Sacramento Municipal Utility District - 1,3,4,5,6 - WECC, Group Name SMUD

Answer	No
Document Name	

Comment

BAs should already have a series of Operating Plans for Emergencies per EOP-011 and TOP-002. There is no need for annual reviews which are already covered in EOP-011.

Likes 0	

Dislikes 0	
Response	
Lindsay Wickizer - Berkshire Hathaway - PacifiCorp - 6	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF	
Answer	Yes
Document Name	
Comment	
None.	
Likes 0	
Dislikes 0	
Response	
Casey Perry - PNM Resources - 1,3 - WECC,Texas RE	
Answer	Yes
Document Name	
Comment	
PNMR supports EEI's comments: While EEI agrees that the proposed requirements in Requirements 8, 9 & 10 and associated timeframes, we additionally ask that the emergency operating procedures contained in Requirement R8 are reviewed to ensure they do not duplicate any of the requirements in EOP-011. Requirement R10 states the “Balancing Authority shall address any reliability risks identified by its Reliability Coordinator pursuant to Requirement R7 and resubmit its Operating Process (s) to its Reliability Coordinator within 30 calendar days of receipt” however, we do not see where the RC within Requirement R7 would identify a reliability risk. Please clarify.	

Likes 0	
Dislikes 0	
Response	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ben Hammer - Western Area Power Administration - 1,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Hillary Creurer - Allete - Minnesota Power, Inc. - 1	
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	

12. Implementation of Operating Process: R11 is a follow-up from R7, where the BA is now implementing the Operating Process that was previously developed. R12 requires the RC to ensure quick dissemination of critical information to a list of entities which can take appropriate actions to respond to the forecasted Energy Emergency. Does the proposed language clearly outline the responsibilities of the BA and RC in the event of a forecasted Energy Emergency? Is the 24-hour notification window feasible and appropriate for the types of emergency situations that might arise? Please provide any other comments about the language in Requirements 11 and 12.

Alan Kloster - Evergy - 1,3,5,6 - MRO	
Answer	No
Document Name	
Comment	
Evergy supports and incorporates by reference the comments of the Edison Electric Institute for questions #12.	
Likes 0	
Dislikes 0	
Response	

Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	No
Document Name	
Comment	
ERCOT joins the comments submitted by the IRC SRC and adopts them as its own.	
Likes 0	
Dislikes 0	
Response	

Marcus Bortman - APS - Arizona Public Service Co. - 1,3,5,6	
Answer	No
Document Name	
Comment	
AZPS feels this would not add reliability benefit and would only serve to increase the RC function compliance risk. The RC has an incentive to communicate information that would protect the reliability of the system. There is no need for this time requirement on a forecasted EEA.	
Likes 0	

Dislikes 0	

Response

Harishkumar Subramani Vijay Kumar - Independent Electricity System Operator - 2, Group Name IRC SRC

Answer	No
Document Name	

Comment

Emergency procedures should be comprehensively covered under EOP-011 as noted in our response to Questions #9 and #11. To the extent notifications are retained for OPERAs, BAs and TOPs should share their Operating Processes directly with entities that have a role, similar to what is done under TOP-002-4, R3 and R5. There is no value added by requiring the RC to disseminate them. Likewise, BAs and TOPs should provide their plans to the RC (see TOP-002-4, R6-R7). If the RC notification requirement is retained, the SRC recommends that the language in R12 requiring the RC to notify neighboring RCs be revised to require the RC to notify neighboring RCs “within the same Interconnection.”

Likes 0	
Dislikes 0	

Response

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

Answer	No
Document Name	

Comment

A. Based on BC Hydro’s understanding of the reliability need this proposed standard is trying to address, it would be adequately covered by EOP-011.

B. The use of “Reliability Coordinator-reviewed” language in Requirement R11 is not required. The Requirement for a BA to submit is R8 and an RC to review is R9 and therefore the language in R11 is redundant. If it is kept, it implies that the BA won’t start implementing the Operating Process until R9.2 is met. As well, R11 isn’t clear of which Operating Process(s) is being referred to and if the “Reliability Coordinator-reviewed” language is kept, it could imply that any other Operating Processes developed under other Standards and referenced in R2 would also need to be RC reviewed prior to them being implemented.

C. As well, it is not clear what the expectation is on the RC to resolve identified issues by the BA and does there need to be any closure after the initial notification by the RC. BC Hydro recommends clarifying.

D. Under Requirement 12, it not clear what data will need to be shared between the BA(s) and RC(s) when the RC sends a notification. There does not seem like there is a need to share this info or data with other BAs or RCs. Should this need exist, BC Hydro recommends that data sharing agreements would be required to enable the exchange of relevant information with other BAs and/or RCs as appropriate.

Likes 0	
Dislikes 0	

Response

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	No
Document Name	
Comment	
EEI does not agree with the timeframe requirement for the RC to communicate a forecasted EEA. This would not add reliability benefits and would only serve to increase the RC's compliance risk. The RC has an incentive to communicate information that would protect the reliability of the system. There is no need for this time requirement on a forecasted EEA.	
Likes 0	
Dislikes 0	
Response	
David Jendras Sr - Ameren - Ameren Services - 1,3,6	
Answer	No
Document Name	
Comment	
Ameren agrees with and supports MISO's comments.	
Likes 0	
Dislikes 0	
Response	
Leslie Burke - Southern Company - Southern Company Generation - 5,6, Group Name Southern Company	
Answer	No
Document Name	
Comment	
Southern Company supports the EEI comments and does not agree with the timeframe requirement for the RC to communicate a forecasted EEA.	
Likes 0	
Dislikes 0	
Response	
Jason Snodgrass - Georgia System Operations Corporation - 3 - SERC	

Answer	No
Document Name	
Comment	
GSOC agrees that the RC should disseminate necessary information on a timely basis, but does not agree with the specific wording of these requirements. GSOC is supportive of the alternate language being submitted by Southern Company.	
Likes 0	
Dislikes 0	
Response	
Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO	
Answer	No
Document Name	
Comment	
This is RC's responsibility. MH supports MRO NSRF's vote and comments for this one.	
Likes 0	
Dislikes 0	
Response	
Nikki Carson-Marquis - Minnkota Power Cooperative Inc. - 1 - MRO	
Answer	No
Document Name	
Comment	
Minnkota Power Cooperative supports comments by the MRO New Standards Review Forum (MRO NSRF) and ACES.	
Likes 0	
Dislikes 0	
Response	
Sean Steffensen - IDACORP - Idaho Power Company - 1	
Answer	No
Document Name	

Comment
Similar to our comments on R6, whether or not 24-hour notification to other BAs and entities is appropriate will depend on the timeframe of the OPERA and how far out the forecasted EEA is. Existing EEA notification processes should apply. It may not be appropriate or desirable for 24-hour notifications to occur if the potential EEA is forecast to occur days or weeks out, resource and load forecasts are variable and subject to change, and the entity has not yet had an opportunity to resolve the issues of concern in the normal course of business (through day-ahead or other energy purchases or other mechanisms).

Likes 0	
Dislikes 0	

Response

Jennie Wike - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6 - WECC, Group Name Tacoma Power

Answer	No
Document Name	

Comment
Tacoma Power supports the MRO NSRF comments.

Likes 0	
Dislikes 0	

Response

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

Answer	No
Document Name	

Comment
Emergency procedures should be comprehensively covered under EOP-011 as noted in our response to Questions #9 and #11. To the extent notifications are retained for OPERAs, BAs and TOPs should share their Operating Processes directly with entities that have a role, similar to what is done under TOP-002-4, R3 and R5. There is no value added by requiring the RC to disseminate them. Likewise, BAs and TOPs should provide their plans to the RC (*see* TOP-002-4, R6-R7).

Likes 0	
Dislikes 0	

Response

Lindsay Wickizer - Berkshire Hathaway - PacifiCorp - 6

Answer	No
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 Collaborators	
Answer	Yes
Document Name	
Comment	
We recommend making a minor modification to the language of the proposed Requirement R11. We suggest modifying R11 by using language comparable to R6: “Each Balancing Authority shall implement one or more Operating Processes, developed in accordance with R7, when a Near-Term OPERA forecasts an Energy Emergency Alert consistent with the scenarios developed in R2.”	
Likes 0	
Dislikes 0	
Response	
Casey Perry - PNM Resources - 1,3 - WECC,Texas RE	
Answer	Yes
Document Name	
Comment	
PNMR agrees that the language contained in Requirements R11 and R12 clearly define the responsibilities for both the BA and RC in the event of a forecasted Energy Emergency.	
Likes 0	
Dislikes 0	
Response	
Keith Jonassen - ISO New England, Inc. - 2 - NPCC	

Answer	Yes
Document Name	
Comment	
Since this requirement has a different timeframe than EOP-011 R5, ISO-NE believes this requirement is appropriate.	
Likes 0	
Dislikes 0	
Response	
Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF	
Answer	Yes
Document Name	
Comment	
None.	
Likes 0	
Dislikes 0	
Response	
Tim Kelley - Sacramento Municipal Utility District - 1,3,4,5,6 - WECC, Group Name SMUD	
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	
Hillary Creurer - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ben Hammer - Western Area Power Administration - 1,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	
Document Name	
Comment	
Texas RE noticed the use of the term “Emergency notification” in Requirement R12. Is this intended to be the same as an Energy Emergency Alert as described in Attachment 1 of EOP-011-2? Perhaps the SDT should consider a NERC Glossary definition of Energy Emergency Alert. Texas RE also requests clarification on neighboring Reliability Coordinators as neighboring is not a defined term.	
Likes 0	
Dislikes 0	
Response	

13. Provide any additional comments for the SDT to consider, if desired.	
Todd Bennett - Associated Electric Cooperative, Inc. - 1,3,5,6, Group Name AECI	
Answer	
Document Name	
Comment	
AECI appreciates the opportunity to provide informal comment on this draft standard. Based on SME feedback it appears this proposed standard is duplicative of current standards. TOP-002-4 currently includes requirements for the Balancing Authority to have Operating Plan(s) for the next-day that addresses expected generation resource commitment and dispatch, Interchange scheduling, Demand patterns, and Capacity and energy reserve requirements, including deliverability capability. R7-R12 of the new proposed standard are duplicative to the current EOP-011 standard which already requires coordination with the RC on potential energy or capacity shortages and emergencies along with emergency operating plans and actions. The draft approach may provide minimal improvement to reliability and signifigant additional regulatory administrative burden.	
Likes 0	
Dislikes 0	
Response	
Hillary Creurer - Allete - Minnesota Power, Inc. - 1	
Answer	
Document Name	
Comment	
Minnesota Power supports EEI's comments.	
Likes 0	
Dislikes 0	
Response	
LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	
Document Name	
Comment	
Because the standard is not applicable to the TOP and consists of energy assurance, this standard should be located within the BAL standard set, not the TOP standard set. Alternatively, the standard could be placed within the IRO standard set applicable to RCs, since the RC is also listed as one of	

the applicable registered entities. The current proposed placement within the TOP standard set creates the opportunity for confusion, which can easily be mitigated by choosing one of the two standard sets applicable to the BA or RC, respectively.

Likes 0	
Dislikes 0	

Response

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

Answer	
Document Name	

Comment

Overall, the MRO NSRF supports the concept of performing Energy Reliability Assessments; however, we believe there are several structural items that need work in the proposed draft:

I. The standard lacks purpose and a Purpose statement. It is unclear what risk the standard is attempting to address.

The Purpose statement needs to clearly articulate what additional reliability benefits will be achieved as a result of implementing this standard. At this time, it is unclear whether there would be any additional benefits over existing processes. If the focus of this standard is the BA, what BA functions are we seeking to address (e.g. adequacy of reserves, frequency response, etc.)? Further, if we find resources are insufficient, what additional actions can be taken in an Operations Planning horizon? If the focus is solely on the BA, why is this standard in the TOP family and not the BAL family of standards?

Without a clear objective, the standard meanders over the entire operations spectrum and spends too much time dictating "how" OPERAs are to be performed and little time on what benefits will be achieved. In addition, it is unclear whether the intent of this standard is to retire the Operating Plans required under TOP-002-4 (R1 and R4) in favor of OPERAs once this project is complete. If not, the SDT should clearly articulate how OPERAs differ from OPAs and what risk OPERAs address beyond that of OPAs.

For example: Each scenario involving an energy contingency could include a simple energy accounting: how much energy is lost in the time period, what resources are expected to replace it, is the replacement energy and associated fuel available, and is the resulting capacity factor of the replacement or marginal resources highly achievable?

II. The natural progression of existing standards should be preserved: seasonal assessments, OPERAs (TOP-XXX-X), OPAs (TOP-002), RTAs (TOP-001) and emergency procedures (EOP-011).

The MRO NSRF's understanding is the intent of the OPERA is to bridge seasonal assessments and Operating Plans (OPAs) pursuant to TOP-002. The MRO NSRF notes that *no* time horizon is currently listed in proposed standard TOP-XXX-X, requirement R1 which also contributes to a lack of clarity. In terms of time horizon, following is the order of standards (in decreasing lead time to real-time):

- Seasonal assessments - seasonal to one year out
- **TOP-XXX: Operations Planning Energy Reliability Assessments (OPERAs) -** 7 day to one month look ahead
- **TOP-002:** Operating Planning Analysis (OPAs) and Operating Plans (OP) - Next Day
- **TOP-001:** Real-Time Assessments (RTAs) - Real-time; normal operations
- **EOP-011:** Emergency procedures - Real-time; emergency operations

Recommendation: The SDT should consider how OPERAs fit into the overall Operations Planning horizon, clearly define the goal of OPERAs and articulate what risk they address. Then write requirements to achieve the stated goal. OPERAs should feed into the OPA process and not leapfrog OPAs and RTAs by moving directly into emergency procedures. If there are inadequacies in EOP-011, they should be addressed in EOP-011.

III. The standard is written from a Control Area perspective, assigning all tasks to the Balancing Authority (BA), ignoring the role of the Transmission Operator (TOP). This needs to be fixed.

It is difficult to conceive how the Balancing Authority can prepare a multi-day look ahead OPERA that considers transmission usage, outages and contingencies that result in the loss of supply without the Transmission Operator (TOP) performing a parallel analysis. At a minimum, the TOP should evaluate System Operating Limits (SOLs) to ensure they are not exceeded in the OPERA.

IV. The standard fails to require Generator Operators (GOPs) to provide the necessary data (over the Study Period) to perform the OPERA. This needs to be fixed.

To the extent TOP-XXX requires BAs (and TOPs) to consider generator specific factors such as: fuel supply and inventory, consumable fuels, environmental constraints, emission limits, etc., in preparing its OPERA, TOP-XXX *must* also include a corresponding requirement for Generator Operators (GOP) to provide the BA and TOP with this information for the time horizon required.

V. To ensure consistency across OPERAs in an efficient manner, the Reliability Coordinator (RC) should develop an OPERA methodology (as done in FAC-011) that would be distributed and followed by the BAs and TOPs in its RC footprint.

If the SDT retains the scope of the OPERA, the RC should develop an OPERA methodology to be used by the BAs and TOPs in its footprint. This would eliminate the need for Table 1 in the standard and go along way in ensuring consistency and coordination akin to **System Operating Limits Methodology for the Operations Horizon** (**FAC-011-4, R9**). If the RC were to develop this it would allow for more flexibility with the OPERAs.

Likes 0	
Dislikes 0	

Response

Jennie Wike - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6 - WECC, Group Name Tacoma Power

Answer	
Document Name	

Comment

Tacoma Power supports the concept of performing ERAs. However, Tacoma Power is concerned on the overlap between the new Requirements and the existing Requirements in TOP-002-4 and EOP-011-3. As outlined in this posting, the OPERA could satisfy the OPA Requirements. Additional information is needed in a technical rationale or implementation guidance to understand the difference between the OPA TOP-002 Requirements and the proposed OPERA.

Tacoma Power also supports the comments from MRO NSRF.

Likes 0	
Dislikes 0	

Response

Sean Steffensen - IDACORP - Idaho Power Company - 1	
Answer	
Document Name	
Comment	
Near-term reliability planning is critical and undertaken today by entities even without this standard. While improvements can always be made, the incremental benefit of the improvement should also be considered. The standard appears to impose broad requirements without recognition of regional or local facts and circumstances. Resources should be focused on addressing high-risk seasons or periods, without requiring significant additional workload in lower-load, lower-risk periods. While events can still happen in those periods, the standard should balance the risk with the additional effort required, particularly given other existing requirements and processes.	
Likes 0	
Dislikes 0	

Response

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	
Document Name	
Comment	
BPA supports the concept that entities ensure that they have energy assurance and thanks the SDT for their work on this standard. BPA agrees that while BAs should determine whether their load profile will be able to be served reliably from generators and imports, deliverability is critical for ensuring reliability. BPA proposes language updates above for the SDT's consideration to make the purpose and requirements more clear. BPA would like to request the SDT discuss whether it is possible for this standard to not be part of the Reliability Standard Family for Transmission Operations (TOP). BPA thinks it would be a better fit as a BAL standard (or maybe a MOD standard). While standards in the TOP Reliability Standard Family do have BA requirements, they are predominantly for the Transmission Operator and this standard is only for the BA (and RC). The type of assessment outlined in this standard is less a power flow type study and more energy assurance and deliverability (transmission rights) evaluation. As written, this standard would allow a BA to look out over the course of an entire month (with no requirement for reassessment weekly). Looking out an entire month (without required reassessment) is not ensuring reliability due to the quality of data available that far ahead of time. BPA believes a weekly assessment is more appropriate and would provide real value. If the desire is to look out beyond a week, consider looking at a study resolution of a daily assessment.	
Likes 0	
Dislikes 0	

Response

Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF	
Answer	
Document Name	
Comment	
None.	
Likes 0	
Dislikes 0	
Response	

Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	
Document Name	
Comment	
Texas RE strongly encourages the drafting team to provide a sample timeline, illustrating all timeframes in the requirements and how they all work together. Texas RE is concerned there may be an assessment based on a process that may not cover all the Real-time issues (how many wind plants lose “fuel” and what impact does it have on an Operating Process). If a BA has to change an Operating Process to contain a reliability risk, it may not have time for review by the RC. This could lead to the industry not having a paper trail that covers any issue and when it does not in Real-time there will be compliance consequences.	
Likes 0	
Dislikes 0	
Response	

Nikki Carson-Marquis - Minnkota Power Cooperative Inc. - 1 - MRO	
Answer	
Document Name	
Comment	
Minnkota Power Cooperative supports comments by the MRO New Standards Review Forum (MRO NSRF) and ACES.	
Likes 0	

Dislikes 0	
Response	
Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO	
Answer	
Document Name	
Comment	
We agree with MRO NSRF's comments that this standard is lacking of purpose statement and clarification of the different scope with other standards. Please refer to MISO's comments for more details.	
Likes 0	
Dislikes 0	
Response	
Jason Snodgrass - Georgia System Operations Corporation - 3 - SERC	
Answer	
Document Name	
Comment	
GSOC is generally supportive on an Energy Reliability Assessment standard, but believes the proposed standard as written is overly burdensome. GSOC is supportive of the alternate language being submitted by Southern Company.	
Likes 0	
Dislikes 0	
Response	
Leslie Burke - Southern Company - Southern Company Generation - 5,6, Group Name Southern Company	
Answer	
Document Name	TOP-0XX_ERA__redline_SOCO1.docx
Comment	
Southern Company supports the comments submitted by EEI and the proposed language changes to R1 provided in Question 2 and would go a step further to state that the language as put forward by EEI in R1.3 would provide for all needed ERAs in the Operations Planning Horizon. This language would include assessments for both the Next Day (near real-time) and Seasonal (upcoming season) time periods.	

Southern Company also supports the EEI stance in Question 5 that Table 1 should not be included in the proposed standard. The proposed language changes to R1 provided by EEI in Question 2 provide enough direction to define how and when the ERA will be performed by the BA in R1.3.

In addition to supporting the EEI comments in Questions 6 through 12, Southern is including additional proposed language to aid the SDT. We believe these revisions will reduce the compliance burden on the RC while effectively supporting their need to review the BA ERA Processes and remain informed of relevant ERA results. **See the attached documentation**.

Please email pdburns@southernco.com for any questions regarding these comments.

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 RSC

Answer	
Document Name	

Comment

We support the project.

Likes 0	
Dislikes 0	

Response

Keith Jonassen - ISO New England, Inc. - 2 - NPCC

Answer	
Document Name	TOP-0XX Energy Reliability Assessment ISO-NE edits 10-3-2023 Clean Redline.docx

Comment

Is a TOP Standard appropriate for this?

1. TO/TOP entities are not included in the Applicability Section.
2. This would be the only TOP Standard that would include the RC Function as an Applicable Entity.
3. Would this be better suited in a new EOP Standard?

a. The Standard is referenceing Forcasted Energy **Emergencies**,

b. This is applicable to **BAs** and **RCs,**

c. **RCs** are not in applicable section of any BAL Standards, and

d. This Standard is already modeled after EOP-011.

ISO-NE is submitting a redline version of TOP-0XX in its response to Question 13.

Likes 0	
Dislikes 0	

Response

David Jendras Sr - Ameren - Ameren Services - 1,3,6

Answer	
Document Name	

Comment

Ameren agrees with and supports MISO's comments.

Likes 0	
Dislikes 0	

Response

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

Answer	
Document Name	

Comment

EEI offers the following additional comments for consideration:

The proposed draft standard introduces unnecessary definitions and requirements that are duplicative with existing standards. As such, we are providing modifications with explanations to assist the standard drafting team.

The Energy Reliability Assessment standard should be drafted in a manner that gives flexibility for regional needs and gives deference to entities with the appropriate knowledge and experience of the systems within their control. Any process performed pursuant to the standard should only be performed when necessary to enhance reliability.

Propose changing the name of this standard to (in boldface): "**Operations Planning** Energy Reliability Assessment**s**"

The inconsistent use of "study duration" and "study horizon" should be standardized in the next version of this proposed standard.

The language in this standard more closely aligns with a BAL Standard, not a TOP Standard. The STD should consider changing this to a BAL standard or possibly adding these requirements to EOP-011. Alternatively, the requirements in the proposed TOP standard could be split between a BAL and EOP to mirror the current relationship between TOP and EOP standards for existing Transmission Operations Planning assessments.

Likes 0	
Dislikes 0	

Response

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

Answer	
Document Name	

Comment

A. R1, R2, R7, R11 include references Reliability Coordinator-reviewed language. This increases the BA risk of noncompliance against R1, R2 and R7 should the RC fail to perform their review. There are specific Requirements for the BA to submit R1 process and R2 scenarios/method of development to the RC in R3, and same for R7 to be submitted by the BA to the RC in R8. Therefore BC Hydro recommends removing the Reliability Coordinator-reviewed language from R1, R2 and R7. This will ensure clear measures for compliance.

B. The proposed standard appears too granular and prescriptive with no clear justification on the specific improvements to grid Reliability. Specific regions may have specific facts and circumstances that may inform the frequency of assessments and the length of time period being assessed; there should be flexibility to be customizable based on an entity's circumstances. If specific areas of the NERC footprint would benefit from such an approach, it may be better to address those regional concerns through other means than a Standard.

C. Additionally, the amount of time provided for comment was too short to be able to provide in-depth feedback. Given the large number of proposed changes, BC Hydro would recommend that more time be allowed for Standards with significant changes/new definitions/etc. and that industry webinars be conducted to discuss the proposed changes and allow a more interactive platform to provide comments and gain clarity.

D. BC Hydro also notes that the Questions seem to provide further interpretation of the Definitions and Standard that would be lost once the Standard is finalized. Also, it is confusing to try to understand all the timeline expectations for the study periods versus study frequencies. BC Hydro recommends developing technical justification/rationale/guidance to support the Standard Requirements and including a sample/generic timeline showing the Study Period/Duration/Frequency to help visually understand and tie the definitions with the Standard Requirements.

Likes 0	
Dislikes 0	

Response

Harishkumar Subramani Vijay Kumar - Independent Electricity System Operator - 2, Group Name IRC SRC

Answer	
Document Name	

Comment

The SRC believes there are several structural items in the proposed draft that would benefit from further refinement: I. The standard lacks purpose and a purpose statement. It is unclear what risk the standard is attempting to address. Without a clear objective, the standard meanders over the entire operations spectrum and spends too much time dictating how OPERAs are to be performed and little time on what benefits will be achieved. In addition, it is unclear whether the intent of this standard is to retire the Operational Planning Analysis and next-day Operating Plans required under TOP-002-4 (R1 and R4) in favor of OPERAs once this project is complete. If not, the SDT should clearly articulate how OPERAs differ from OPAs and what risk OPERAs address beyond what OPAs address. Additionally, as the standard is currently drafted, the SRC has identified several factors that will

significantly diminish the accuracy and usefulness of the Near-Term OPERA, and the SRC is uncertain what actions a BA would be able to take to mitigate a forecasted Energy Emergency that a BA cannot already take under existing NERC Reliability Standards and with the tools already available to it. The SRC requests that the SDT address these issues, either by revising the draft standard or by providing additional information in the technical rationale or implementation guidance. II. The natural progression of existing standards should be preserved: seasonal assessments, OPAs (TOP-002), RTAs (TOP-001), and emergency procedures (EOP-011). The SRC's understanding is the intent of the OPERA is to bridge seasonal assessments and Operating Plans (OPAs) pursuant to TOP-002. The SRC notes that no time horizon is currently listed in proposed standard TOP-XXX-X, requirement R1, which also contributes to a lack of clarity. In terms of time horizon, following is the order of standards (in decreasing lead time to real-time): • Seasonal assessments - seasonal to one year out • TOP-XXX: Operations Planning Energy Reliability Assessments (OPERAs) - 7 day to one month look ahead • TOP-002: Operating Planning Analysis (OPAs) and Operating Plans (OP) - Next Day • TOP-001: Real-Time Assessments (RTAs) - Real-time; normal operations • EOP-011: Emergency procedures - Real-time; emergency operations Recommendation: The SDT should consider how OPERAs fit into the overall Operations Planning horizon, clearly define the goal of OPERAs and articulate what risk they address, then write requirements to achieve the stated goal. OPERAs should feed into the OPA process and not leapfrog OPAs and RTAs by moving directly into emergency procedures. If there are inadequacies in EOP-011, they should be addressed in EOP-011. III. The standard is written from a Control Area perspective, assigning all tasks to the Balancing Authority (BA), ignoring the role of the Transmission Operator (TOP). This needs to be fixed. It is difficult to conceive how the Balancing Authority can prepare a multi-day look ahead OPERA that considers transmission usage, outages, and contingencies that result in the loss of supply without the Transmission Operator (TOP) performing a parallel analysis. At a minimum, the TOP should evaluate System Operating Limits (SOLs) to ensure they are not exceeded in the OPERA. IV. The standard fails to require Generator Operators (GOPs) to provide the BA the necessary data (over the Study Period) to perform the OPERA, and it is not clear that data of sufficient quality is available over the timeframes contemplated in the standard. Regarding the Near-Term OPERA, requirement R1, part 1.1.4 contemplates a Study Duration of at least seven days, while part 1.1.3 contemplates a Study Temporal Resolution of one hour. The SRC has already addressed the ambiguity of the Study Duration in its response to question 2 above, and is concerned that the draft standard does not appear to provide a mechanism for the BA to obtain the high-quality input data that would be necessary for a 7-day study to produce accurate and useful results. Performing such a study would require additional data from generation units, such as: fuel supply and inventory, consumable fuels, environmental constraints, emission limits, etc. Any requirement for a BA to prepare an OPERA must also include a corresponding requirement for Generator Operators (GOP) to provide the BA and TOP with this information for the time horizon required. Compounding this issue, it is the SRC's experience that information regarding expected generator performance, and particularly information regarding expected fuel supply constraints, is rarely accurate more than one or two days in advance of the operating day, if it is even available at all. This is due in part to the need for the day-ahead market to solve before generators can know what will be required of their units and for the BA to know if it will need to commit additional units to maintain reliability. Attempting to forecast Energy Emergencies seven days out with limited input data would likely result in a large number of false positives. These considerations, combined with the resource-intensive nature of a seven-day study with a one-hour temporal resolution, mean that the value of the Near-Term OPERA results may not justify the resources required to perform the assessment. V. To ensure consistency across OPERAs in an efficient manner, the Reliability Coordinator (RC) should develop an OPERA methodology (as done in FAC-011) that would be distributed and followed by the BAs and TOPs in its RC footprint. If the SDT retains the scope of the OPERA, the RC should develop an OPERA methodology to be used by the BAs and TOPs in its footprint. This would eliminate the need for Table 1 in the standard and go a long way towards ensuring consistency and coordination akin to the System Operating Limits Methodology for the Operations Horizon (FAC-011-4, R9). VI. The reliability benefit of the proposed standard is unclear. Finally, it is unclear what additional tools would be available to a BA to mitigate any forecasted Energy Emergencies compared to the tools that BAs already use. Fuel supply issues, just like other factors that impact generator capabilities, already result in outages or derates being entered in the BA's outage scheduler, and BAs already have the tools and procedures to address unit outages and derates. Even if the BA had additional advanced notice of a fuel supply-related outage or derate, the BA does not have the ability or the authority to involve itself with fuel supply contracts and deliverability issues. Additional advance notice also would not impact the BA's ability to commit a unit for reliability, since the day-ahead market would still need to solve before reliability commitments could be used. Consequently, it is unclear to the SRC what overall benefit would result from the Near-Term OPERA as proposed, and the SRC requests that the SDT revise the draft standard to address this concern and the other concerns the SRC has identified.

Likes 0	
Dislikes 0	

Response

Casey Perry - PNM Resources - 1,3 - WECC,Texas RE

Answer	

Document Name	
Comment	

PNMR supports EEI's comments for question 13:

Propose changing the name of this standard to (in boldface): "**Operations Planning** Energy Reliability Assessment**s**"

Throughout the Standard it mentions the "Time Horizon: Operations Planning" yet the Standard never defines what the Time Horizon actually is in the context of this Reliability Standard. (Ref. R3, R7, R8, R12)

The language in this standard more closely aligns with a BAL Standard, not a TOP Standard. The STD should consider changing this to a BAL standard.

Likes 0	
Dislikes 0	
Response	

Marcus Bortman - APS - Arizona Public Service Co. - 1,3,5,6	
Answer	
Document Name	
Comment	

AZPS has not additional comments.

Likes 0	
Dislikes 0	
Response	

Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	
Document Name	
Comment	

ERCOT joins the comments submitted by the IRC SRC and adopts them as its own.

Likes 0	
Dislikes 0	
Response	

Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators	
Answer	
Document Name	
Comment	
Thank you for the opportunity to comment.	
Likes 0	
Dislikes 0	
Response	
Alan Kloster - Evergy - 1,3,5,6 - MRO	
Answer	
Document Name	
Comment	
Evergy supports and incorporates by reference the comments of the Edison Electric Institute for questions #13.	
Likes 0	
Dislikes 0	
Response	
Tim Kelley - Sacramento Municipal Utility District - 1,3,4,5,6 - WECC, Group Name SMUD	
Answer	
Document Name	
Comment	
This new standard expresses the good and necessary intention for BAs to evaluate resources and loads for forecasted emergencies. However, these 12 requirements are duplicate and unnecessary studies/assessments/reviews for BAs and RCs.	
Likes 0	
Dislikes 0	
Response	