

NERC Project 2009-18 *****

Synopsis: A ballot pool and pre-ballot window has opened for the NERC Project 2009-18 (“Withdraw Three Midwest ISO Waivers”). The applicable entity is a **Balancing Authority**.

The Midwest ISO is now a Balancing Authority so three NERC waivers are being withdrawn for the standards:

- Inadvertent Accounting Waiver from BAL-006 — Inadvertent Accounting
- Scheduling Agent Waiver from INT-003 — Interchange Transaction Implementation
- Enhanced Scheduling Agent Waiver from INT-003 — Interchange Transaction Implementation

Also, two standards are being revised

- BAL-006-2 — Inadvertent Interchange
- INT-003-3 — Interchange Transaction Implementation

RSDP *****

Synopsis: The modified Reliability Standards Development Procedure is open for a re-ballot. All entities are applicable. The initial ballot results were voided and all previous votes have been removed from the count. Voters have been asked to resubmit their votes and any applicable comments.

The modification were:

- The procedures to develop and approve of the Violation Risk Factors and the Violation Severity Levels were modified.
- National security emergencies were integrated.
- The Joint Interface Committee was dissolved.

Project 2007-17 *****

Synopsis: **Project 2007-17 (“Transmission and Generation Protection System Maintenance and Testing”)** has opened for a comment period. This project is applicable to **GO, TO, & DP**. This project consolidated four existing NERC standards (PRC-005-1, PRC-008-0, PRC-011-0, and PRC-018-0) into one standard. (PRC-005-2)

This consolidated standard will allow the Protection System owner to have a time based, condition based, and/or a performance based maintenance program; the Protection System owner will have the flexibility to take advantage of different levels of monitoring.

Should the Protection System owner have a Protection System component which does not have self-monitoring alarms or if self-monitoring alarms are available and those alarms are not transmitted to a location where action can be taken for those alarmed failures, then the maintenance interval will be as short as those listed in table 1a (“Maximum Allowable Testing Intervals and Maintenance Activities for Unmonitored Protection Systems”); however, should a Protection System component have self-monitoring alarms which are transmitted to a location where action can be taken for those alarmed failures, then the maintenance intervals can be expanded to those listed in table 1b (“Maximum Allowable Testing Intervals and Maintenance Activities for Partially Monitored Protection System Components”). For example, if a protection system owner had an unmonitored protection relay, it would have to maintain this relay every 6 years, but this owner could connect this relay to SCADA or have a person check this relay daily for alarm failures, then this relay could be maintain every 12 years.

Another feature of this standard is that it more clearly delineates which generation Protection Systems will be required to be included in a maintenance program.

“Categorizing Cyber Systems – An Approach based on BES Reliability Functions” Concept Paper *****

Synopsis: Concept Paper to modify existing NERC Reliability CIP-002 through CIP-009 Standards pursuant to FERC order 706. All Entities are applicable. Comments and Suggestions are due September 4, 2009. These comments and suggests are to cover four specific areas of interest:

1. BES reliability functions
2. identification of BES subsystems and BES cyber systems
3. mapping of BES subsystems
4. categorization of cyber systems

Order 706 B Nuclear Plant Implementation Plan *****

Synopsis: The Applicable entity is a Nuclear power plant. FERC’s Cyber Security Order 706B told NERC to create an implementation plan for the CIP-002-1 through CIP-009-1 standards across nuclear power plants. This implementation plan is open for simultaneous commenting and balloting period to be closed on August 14, 2009.

Changes to NERC functional Model *****

Synopsis: The NERC Reliability Standards are based on the NERC functional model. This model along with its technical supporting document (Separate NERC email announcement) has been revised and comments on these revisions are due back August 19, 2009. All entities are applicable.

The revisions were:

- Consideration of comments from Planning Committee regarding Demand Resources function and associated responsible entities
- Review of all Planning functions and respective responsible entities
- Review of Interchange function and Interchange Authority as the responsible entity
- Review of Load Serving Entity and Distribution Provider
- Review of Terminology and Definitions for consistency with other NERC documents

Project 2006-08 (TLR) *****

Synopsis: A comment period has open for this project 2006-08(“Reliability Coordination – Transmission Loading Relief”); this project is applicable to RC and BA entities.

The SDT has revised IRO-006 and IRO-006-EAST in phases. This third phase addressed previous industry comments.

Project 2009-09 CIP-001-1R2

Synopsis: This is a ballot for which *Covanta Energy* is requested an interpretation of **CIP-001-1 R2 (Project 2009-09)** on two points (All entities are applicable):

Question: Please clarify what is meant by the term, “appropriate parties.” Moreover, who within the Interconnection hierarchy deems parties to be appropriate?

Interpretation: CIP-001-1 R2 refers collectively to entities with whom the reporting party has responsibilities and/or obligations for the communication of physical or cyber security event information. Those entities to which communicating sabotage events are appropriate would be identified by the reporting entity and documented within the procedure required in CIP-001-1 R2.

Regarding “who within the Interconnection hierarchy deems parties to be appropriate,” the drafting team knew of no interconnection authority that has such a role.

Project 2009-14 *****

Synopsis: This interpretation (Project 2009-14) will be re-circulated since a negative comment was received; this interpretation responds to three questions asked by PacifiCorp:

(Applicable entities are TP & PA):

1. Does TPL-002-0 R1.3.10 require that all elements that are expected to be removed from service through normal operation of the protection systems be removed in simulations?

Interpretation: TPL-002-0a R1.3.10 does require that all elements expected to be removed from service through normal operations of the Protection Systems be removed in simulations.

2. Is a Category B disturbance limited to faults with normal clearing where the protection system operates as designed in the time expected with proper functioning of the protection system(s) or do Category B disturbances extend to protection system misoperations and failures?

Interpretation: This standard does not require an assessment of the Transmission System performance due to a Protection System failure or Protection System misoperation.

3. Does TPL-002-0 R1.3.10 require that planning for Category B contingencies assume a contingency that results in something other than a normal clearing event even though the TPL-002-0 Table I — Category B matrix uses the phrase "SLG or 3-Phase Fault, with Normal Clearing"?

Interpretation: TPL-002-0a R1.3.10 does not require simulating anything other than Normal Clearing when assessing the impact of a Single Line Ground (SLG) or 3-Phase (3Ø) Fault on the performance of the Transmission System.

Note: The NERC Glossary of Terms defines **Normal Clearing** as “A protection system operates as designed and the fault is cleared in the time normally expected with proper functioning of the installed protection systems.”

Project 2006-06 RC *****

Synopsis: A comment period for project 2006-6 (“Reliability Coordination”) has opened; this project is applicable to the following entities: RC, BA, TSP, TOP, DP, GOP, PSE, and LSE.

The SDT reviewed four standards: COM-001-2(“Communications”), COM-002-3(“Communications and Coordination”), IRO-001-2(“Reliability Coordination – Responsibilities and Authorities”), and IRO-014-2(“Coordination Among Reliability Coordinators”).

The SDT was tasked with **1)** ensuring that the reliability-related requirements applicable to the Reliability Coordinator are clear, measurable, unique, and enforceable, **2)** ensuring that this set of requirements is sufficient to maintain reliability of the Bulk Electric System, and **3)** revising the group of standards based on FERC Order 693. The SDT incorporated changes due to the work of the IROL Standards Drafting Team, and two standards from the original Standards Authorization Request (PER-004 and PRC-001) were moved to other projects due to scope overlap.

Project 2007-23 (VSL) & Project 2008-08 (EOP VSL) *****

Synopsis: A 30-day pre-ballot review for 9 sets of Violation Severity Levels (VSL) from two projects 2007-23 (VSL) and 2008-08 (EOP VSL) has been proposed. All entities are applicable.

In June 2008 FERC had expressed that several VSLs should be clarified to remove ambiguous terms, should be made more consistent with requirements, and should be based on one single violation. The standard drafting teams revised the associated VSL and this revision was published for comments in April 2009. The respective SDTs have considered the industry comments submitted and have revised the VSL, accordingly. The latest revisions are available in this 30-day pre-ballot review.

Project 2009 -17*****

Synopsis: Y-W Electric and Tri-State have requested an interpretation of PRC-004-1 R1 & R3 and PRC-005-1 R1 & R2. Applicable entities are: TO, DP, & GO.

Question - Y-W Electric Association, Inc. (Y-WEA) and Tri-State Generation and Transmission Association, Inc. (Tri-State) respectfully request an interpretation of the term "Transmission Protection System" and specifically whether protection for a radially-connected transformer protection system energized from the BES is considered a transmission Protection System and is subject to these standards.

NERC Response - The term Transmission Protection System is applicable to any Protection System that is designed to detect and initiate action for system faults on transmission elements (lines, buses, transformers, etc.) identified as being included in the Bulk Electric System (BES). In general, a radially connected transformer protection system energized from the BES would not be considered a Transmission Protection System. In the event that the transformer low side is connected to a potential source (generator or networked low side system) and there are Protection Systems installed to detect and initiate actions for transmission system faults, then these Protection Systems would be considered transmission Protection Systems. It should also be noted that due to the variance in the Regional Entity definitions of the BES, specific clarification may be required from the appropriate Regional Entity.
