

Comment Form — SAR and Modifications to VSLs for TOP-004

Comment request for proposed SAR and associated VSLs for TOP-004-2. Comments must be submitted by **October 30, 2008**. If you have questions please contact Gerry Adamski at Gerry.Adamski@nerc.net or by telephone at 609-452-8060.

Background Information:

When FAC-010-1, FAC-011-1 and FAC-014-1 were approved in 2006, conforming changes were made to Requirements R3 and R6 in TOP-004-1. The Violation Severity Levels were not revised to reflect the modifications to R3 and R6 and need to be updated so that the compliance elements for the modified TOP-004 are in place when needed – January 1, 2009.

This SAR and associated proposed violation severity levels support changes to TOP-004-1 requirements that were approved in 2006.

The redline version of the VSLs shows the modifications that were made to Requirements R3 and R6 when TOP-004-2 was approved.

Requirement R3 was modified to eliminate the phrase, “when practical” and to change “Regional Reliability Organization policy” to “its Reliability Coordinator” as shown below:

R3. Each Transmission Operator shall, ~~when practical,~~ operate to protect against instability, uncontrolled separation, or cascading outages resulting from multiple outages, as specified by ~~its Reliability Coordinator. Regional Reliability Organization policy.~~ **its Reliability Coordinator.**

Requirement R6 was modified by eliminating subrequirements R6.1 and R6.5:

R6. Transmission Operators, individually and jointly with other Transmission Operators, shall develop, maintain, and implement formal policies and procedures to provide for transmission reliability. These policies and procedures shall address the execution and coordination of activities that impact inter- and intra-Regional reliability, including:

~~R6.1. Equipment ratings.~~

~~R6.2.1.~~ Monitoring and controlling voltage levels and real and reactive power flows.

~~R6.3.2.~~ Switching transmission elements.

~~R6.4.3.~~ Planned outages of transmission elements.

~~R6.5. Development of IROLs and SOLs~~

~~R6.6.4.~~ Responding to IROL and SOL violations.

The language in the proposed Violation Severity Levels has been updated to reflect the renumbering of the sub-requirements in R6.

Please review the SAR and associated modifications to the VSLs and then answer the following questions.

You do not have to answer all questions. Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. The Violation Severity Levels for TOP-004-2 were not revised to reflect the approved modifications to Requirements R3 and R6. Do you agree that the VSLs should be updated so that the compliance elements for the modified TOP-004 are in place when needed? If not, please explain in the comment area.

Yes

No

Comments:

2. The Violation Severity Levels for TOP-004-1 have already been approved. The modifications made to the VSLs for TOP-004-2 have been limited to those changes needed to accurately reflect the approved changes to Requirements R3 and R6. Do you agree that the modifications proposed to the VSLs for R3 and R6? If not, please explain in the comment area.

Yes

No

Comments: See Comments below.

3. If you have any other changes to propose to the SAR or the proposed modifications to the already approved VSLs, please provide them here.

Yes

No

Comments: The MRO is suggesting a revision to the VSLs to conform to the VSLs that are currently being revised.

R6:

Lower VSL: The Transmission Operator developed, maintained, and implemented formal policies and procedures to provide for transmission reliability, addressing the execution and coordination of activities that impact inter- and intra- Regional reliability, including the elements listed in TOP-004-6 R6.1 through R6.4, but failed to include other Transmission Operators in the development of said policies and procedures.

Moderate VSL: The Transmission Operator failed to perform one of the four following: The Transmission Operator failed to include monitoring and controlling voltage levels and real and reactive power flows in the development, maintenance, and implementation of formal policies and procedures. Or

Execution and coordination of activities that impact inter- and intra- Regional reliability, but failed to include The Transmission Operator failed to include switching transmission elements in the development, maintenance, and implementation of formal policies and procedures. Or

The Transmission Operator failed to include planned outages of transmission elements in the development, maintenance, and implementation of formal policies and procedures. Or

The Transmission Operator failed to include responding to IROL and SOL violations in the development, maintenance, and implementation of formal policies and procedures. maintenance, and implementation of formal policies and procedures.

High VSL: The Transmission Operator developed, and implemented formal policies and procedures to provide for transmission reliability. However, The policies and procedures were not maintained. Or

The Transmission Operator failed to perform two of the four following:

The Transmission Operator failed to include monitoring and controlling voltage levels and real and reactive power flows in the development, maintenance, and implementation of formal policies and procedures. Or

Execution and coordination of activities that impact inter- and intra- Regional reliability, but failed to include The Transmission Operator failed to include switching transmission elements in the development, maintenance, and implementation of formal policies and procedures. Or

The Transmission Operator failed to include planned outages of transmission elements in the development, maintenance, and implementation of formal policies and procedures. Or

The Transmission Operator failed to include responding to IROL and SOL violations in the development, maintenance, and implementation of formal policies and procedures. maintenance, and implementation of formal policies and procedures.

Severe VSL: The Transmission Operator failed to develop, maintain and implement formal polices and proceeedures for transmission Reliability. Or

The Transmission Operator failed to perform three or more of the following:

The Transmission Operator failed to include monitoring and controlling voltage levels and real and reactive power flows in the development, maintenance, and implementation of formal policies and procedures. Or

Execution and coordination of activities that impact inter- and intra- Regional reliability, but failed to include The Transmission Operator failed to include switching transmission elements in the development, maintenance, and implementation of formal policies and procedures. Or

The Transmission Operator failed to include planned outages of transmission elements in the development, maintenance, and implementation of formal policies and procedures. Or

The Transmission Operator failed to include responding to IROL and SOL violations in the development, maintenance, and implementation of formal policies and procedures. maintenance, and implementation of formal policies and procedures.