

Unofficial Comment Form for Third Draft of Standards for Real-Time Operations (Project 2007-03)

Please **DO NOT** use this comment form. Please use the [electronic comment form](#) located at the link below to submit comments on the third draft of the standards for Real-Time Operations (Project 2007-03). Comments must be submitted by **September 24, 2009**. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

http://www.nerc.com/filez/standards/Real-time_Operations_Project_2007-03.html

Background Information:

In the 3rd posting for Project 2007-03, the Real-Time Operations Standard Drafting Team (RTO SDT) has attempted to clarify the proposed changes to the TOP family of standards based on industry comments received for the 2nd posting.

***Please use the electronic comment form to submit your final responses to NERC.**

1. TOP-001-2: Do you agree with the changes made to this standard? If not, please supply specific reasons why you do not agree with the changes made.

Yes

No

Comments:

A. In R4, states that the TOP and GOP shall coordinate operations "known or expected" by the TOP that have a reliability impact on other reliability entities. Is the TOP used twice in this requirement the same TOP or neighboring TOPs? Please clarify.

B. In R4, the GOP will not know of "known or expected" operations of the TOP. Please clarify.

C. In R4, as stated the GOP is required to notify the TOP of "relay and equipment failure and changes to generation", does this include all relays and all equipment associated with a generator?

D. In R4, the reference to the term "Load", a TOP and GOP don't have loads. Therefore, how can they be required to coordinate something they don't have? Or

E. In R4, the reference to the term "operating conditions", the GOP may not know of a severe or changing "operating condition" that is taking place on the transmission system.

F. In R2 and R4, "expected to be affected" would include known. Please strike known.

G. Both R5 and R6 require the TOP to identify a sub-set of SOLs that may be larger than the IROL subset ahead of time and notify the RC of what actions it is taking to return the system to within operating limits when they are exceeded. Why is there not a requirement to also operate within those SOLs and return within the SOL if exceeded?

H. The VSLs for R7 appear to assume that the sample set of SOLs that would be reported to the RC is a small number by using one, two, three and four in each successive VSL. What if the sample set is large (i.e. 1000 SOLs)? Should the VSLs be based on percentages?

I. The measures for R5 and R8 need to be clear than they currently are that these are event driven requirements and only data is required if an "event" has occurred.

2. TOP-002-3: Do you agree with the changes made to this standard? If not, please supply specific reasons why you do not agree with the changes made.

Yes

No

Comments: N/A

3. TOP-003-1: Do you agree with the changes made to this standard? If not, please supply specific reasons why you do not agree with the changes made.

Yes

No

Comments:

The term "Long term outages" in the first sub bullet is not clear, please clarify.

4. TOP-004-3: Do you agree with the decision to move the lone remaining requirement of this standard to TOP-001-2? If not, please supply specific reasons why you do not agree with this move.

Yes

No

Comments: N/A

5. TOP-001-2, Requirement R1: Do you believe that the Balancing Authority issues Reliability Directives directly for transmission-related limits and therefore should be in the TOP standards, (vote YES); or do you believe that the Balancing Authority in its role as a Balancing Authority issues Reliability Directives to balance load and generation and only indirectly affects transmission flows (recognizing that an entity that serves as both a Transmission Operator and a Balancing Authority would be covered under the Transmission Operator requirement) (Vote NO). Please be as specific as possible with your reply.

Yes

No

Comments:

The MRO NSRS believes any directives that a BA may issue should be in the BAL standards. R1, states that a BA, DP, LSE, and GOP shall comply with a Reliability Directive issued by a TOP. Reliability Directive is not defined by NERC. A definition has not been proposed.

6. Do you agree that with the changes in the 3rd posting that this project is ready to go to ballot? If not, please supply specific reasons why not.

Yes

No

Comments:

A. A Reliability Directive must be defined and there must be an opportunity to comment before balloting can begin.

B. Our responses to the previous questions are additional reasons why this standard should not go to ballot and that this standard needs another comment period.