

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

Please use the [electronic comment form](#) located at the link below to submit comments on the second draft of the standards for Real-Time Operations (Project 2007-03). Comments must be submitted by **May 7, 2009**. If you have questions please contact Ed Dobrowolski at [ed.dobrowolski@nerc.net](mailto:ed.dobrowolski@nerc.net) or by telephone at 609-947-3673.

[http://www.nerc.com/filez/standards/Real-time\\_Operations\\_Project\\_2007-03.html](http://www.nerc.com/filez/standards/Real-time_Operations_Project_2007-03.html)

### Background Information:

In the second 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 from the first posting. In doing so, several questions arose for which the RTO SDT is seeking industry guidance.

The RTO SDT is seeking comments on its second drafts of the following proposed standards:

- TOP-001-2 — Reliability Responsibilities and Authorities
- TOP-002-3 — Normal Operations Planning
- TOP-003-1 — Planned Outage Coordination
- TOP-004-3 — Transmission Operations
- TOP-008-1 — Response to Transmission Violations

## Comment Form — Project 2007-03 — Real-Time Operations

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1. TOP-001-2, R3: Regarding the requirement to provide emergency assistance - The SDT deleted the phrase "provided that the requesting entity has implemented its comparable emergency procedures" from the first iteration of the revised standard. Based on comments received from the first posting, the SDT is considering reinstating this phrase. Do you agree that this phrase should be reinstated?

Yes

No

Comments:

2. TOP-001-2, R4: Regarding the requirement to coordinate operations – Based on comments received from the first posting, the SDT is considering deleting the GOP from this requirement. Comments were received questioning the role of the GOP in reliability analysis beyond providing the data in TOP-003-1, Requirement R4. Do you agree that the GOP should be deleted from this requirement?

Yes

No

Comments:

3. TOP-001-2, R5: Regarding SOL exceedance notification – The consensus of the industry in the first posting was that some subset of SOLs needs to be reported but there was no clear cut agreement on what subset to report to the RC. The subset of SOLs to be reported must be easily identifiable and measurable while supporting reliability. Please remember in your response that as per the NERC Glossary that IROLs are a subset of SOLs. Given that requirement, what subset of SOLs do you feel need to be reported?

Yes

No

Comments: IROLs are a sufficient subset to report.

4. TOP-004-3, R2: Regarding Agreements on switching – Based on comments received from the first posting, the SDT is considering deleting this requirement. TOP-001-3, Requirement R4 already requires coordination of operations. Given that requirement, is TOP-004-3, Requirement R2 still necessary? Do you agree that TOP-004-3, Requirement R2 can be deleted?

Yes

No

Comments:

5. The RTO SDT is attempting to respond to a directive in FERC Order 693 where a specific country-wide advance notice time period for planned outage notification would be established. Prior to writing such a requirement, the RTO SDT is polling the industry to see if it is needed and what the time period would be. Please indicate if you agree with such a provision. If you agree then please provide a number of days that you would consider appropriate for such advance notice, e.g., 7 days. If you disagree, then please state specific reasons for your disagreement.

Yes

No

Comments (including # of days if appropriate):

After the review of the paragraph 1612 of the FERC final order 693, the MRO NSRS would like them to be more specific about the type of outages and consistent with the Reliability Coordinator's requirement; the Reliability Coordinator has a wide-area view.

How would this country-wide advance notice improve reliability for two independent systems not physically interconnected?

6. Do you generally support the revised standards? If your response is 'No', please explain your single biggest concern with the revised standards, including which specific requirement or set of requirements causes you the most concern and why.

Yes

No

Comments: See response to question number 5 which is "After the review of the paragraph 1612 of the FERC final order 693, the MRO NSRS would like them to be more specific about the type of outages and consistent with the Reliability Coordinator's requirement; the Reliability Coordinator has a wide-area view.

How would this country-wide advance notice improve reliability for two independent systems not physically interconnected?"

In TOP-001-1 R1, what is a reliability directive? Should this be defined? The NERC standard COM-002-2 talks about the RC issuing a reliability directive, what is a directive? Not every communication is a directive; please clarify what is a reliability directive? Should each directive start off by stating that it's a directive and that 3 way communication should be used? (In the MISO Business Practice RTO-OP-002 R7, Telephone Communications Protocol, section 3.2.1, when issuing a Reliability Directive the following must be stated: "This is a Reliability Directive and I will need you to repeat it back.") Other MISO Business Practices which discuss reliability directives are RTO-BPM-006-R2 and RTO-EOP-003-R8.

The current standard TOP-002-2a includes an interpretation of R11 stating among other things that a "unique" study is not needed for each operating day. The MRO NSRS recommends revising the TOP-002-3 R1 to include this interpretation.

For the TOP-003-1 R1, "Each Transmission Operator and Balancing Authority shall have a documented specification for data to support its Real-time monitoring and reliability assessments required to fulfill their respective responsibilities per the NERC Functional Model.", the MRO NSRS believes that this phrase "NERC Functional Model" should be removed since it is unclear as it reads now and it should be replaced with "R1.1, R1.2, and R1.3".