

Unofficial Comment Form for 4th Draft of Real-Time Operations Standards (Project 2007-03)

Please **DO NOT** use this form. Please use the electronic form located at the link below to submit comments on the 4th draft of the standards for Real-Time Operations (Project 2007-03). Comments must be submitted by **September 3, 2010**. 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 4th posting for Project 2007-03, the Real-Time Operations Standard Drafting Team (RTOSDT) has attempted to clarify the proposed changes to the TOP family of standards based on industry comments received for the 3rd posting.

1. TOP-001-2: Do you agree with the changes made to this standard? This includes all aspects of this standard – requirements, measures, data retention, VRF, Time Horizon, and VSL. If not, please supply specific reasons why you do not agree with the changes made.

Yes

No

Comments: The proposed TOP-001-2 standard is a significant improvement, but there are still important items that need to be addressed including:

Comments cannot be developed for this requirement until a final draft of the definition of Reliability Directive is presented as it will have a significant impact on TOP-001-2 and R1. When Reliability directive is defined, the definition of a Reliability Directive is too broad and should be limited to "Abnormal conditions that require operational actions to avoid instability, uncontrolled separation and cascading as defined in Section 215 of the Federal Power Act."

TOP-001-2-R9: SOL's should not be part of the TOP-001-2 standard as there are not identified timeframes in the NERC standards today. However, if SOL's must be included, a better subset must be defined excluding thermal limits with any time limits being clearly specified as a return time after the SOL limit was exceeded such as 30 minutes after exceeding the specified SOL limit.

An example definition might be non-thermal SOL's are those facilities limited below their maximum thermal capability as a proxy to maintain BES stability.

TOP-001-2-R10: It isn't clear when the RC should be informed, before, during, or after actions have been taken to correct an overload. Depending upon the urgency of the situation, it might not be important to notify the RC, therefore the requirement should be changed to the TOP should record actions taken for future review.

For TOP-001-2-R6 replace "coordinate" with "notify the RC and negatively impacted adjacent interconnected NERC registered entities of"

For TOP-001-2-R3, the words "and anticipated" needs to be dropped as an unmeasurable requirement.

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In TOP-001-2-R2 and R4, "expected to be affected" would include known. We asked the SDT to please strike known.

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?

The measures for TOP-001-2-R5 and R8 need to be clear that these are event driven requirements and evidence is only required if an "event" has occurred.

In R6, the word "telemetry" should be capitalized as it is a defined term in the NERC Glossary. The terms "control equipment" and "associated communications channels" are not defined in the glossary at all. Recommend modifying the wording to ensure consistency between standards.

R14 uses the term "monitoring and analysis capabilities". This term is not defined in the NERC Glossary.

R13 implies that a TO's Operational Planning Analyses should be monitoring facilities external to its own operating area when they have no control or responsibility for said facilities. It is not a TO's responsibility to monitor regional system conditions; therefore this requirement should be removed. FERC Order 693, paragraphs 1660 and 1661 do not specifically mention any of the verbiage in requirements R12, R13, & R14; therefore the preceding statement should be considered.

2. TOP-002-3: Do you agree with the changes made to this standard? This includes all aspects of this standard – requirements, measures, data retention, VRF, Time Horizon, and VSL. If not, please supply specific reasons why you do not agree with the changes made.

Yes

No

Comments: The rationale box needs to be clarified. If the drafting team meant for entities to have a primary set of tools / procedures and backup set as well, please clarify that.

"By definition, Operation Planning Analysis includes Contingency analysis" is not accurate. The definition in the Glossary of Terms mentions nothing of contingency analysis. It mentions known transmission and generation facility outages, but that has nothing to do with contingency analysis, which includes a study of unknown events to occur on current system conditions. Therefore, the requirement should read "Each Transmission Operator shall have an Operational Planning Analysis that incorporates potential single contingency events."

Is "plan" in requirement R2 a noun or verb? It appears to read as if it is a verb, which implies no documented action would be necessary. If intended, it should read "Each Transmission Operator shall develop a plan...." This flows much better with what the intent of R2 is trying to say.

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3. TOP-003-1: Do you agree with the changes made to this standard? This includes all aspects of this standard – requirements, measures, data retention, VRF, Time Horizon, and VSL. If not, please supply specific reasons why you do not agree with the changes made.

Yes

No

Comments:

Remove "at the discretion of the Transmission Operator or Balancing Authority" in R1-1.1. The TO and BA are the entities creating the specification, which already implies that any needed parameters are at their discretion. Overall clarification seems necessary on this bullet as well (R1-1.1). Why specifically address equipment of voltage levels below BES levels? Does this exclude equipment rated 100 kV and above? Replace "Real-time monitoring" with "Real-time Assessment" as this is an actual term in the NERC Glossary of Terms. This would follow a similar format to the "Operational Planning Analyses".

4. The implementation plan compares the already approved requirements in the "TOP" standards with those that are proposed in TOP-001-2, TOP-002-2, and TOP-003-2. When comparing the already approved standards with those that are proposed, how would you assess the impact to reliability of the proposed standards are approved and the already approved standards are retired in accordance with the implementation plan?

Reliability will be improved

There will be no change to reliability

There will be an adverse impact to reliability

Comments:

There seems to be a general lack of consistency in the use and meaning of terms relating to remote measurement and remote control of the BES in the TOP, COM and PRC standards. A better glossary would ensure consistent verbiage between the standards groups. The glossary term "Telemetry" is confusingly similar to the one for "SCADA". It wrongfully includes remote control as part of the definition. We suggest it be removed from the glossary and this project.