

## **Comment Form for 5<sup>th</sup> Draft of Standards for Real-Time Operations (Project 2007-03)**

Comments on the 5<sup>th</sup> draft and initial ballot of the standards for Real-Time Operations (Project 2007-03) **must be submitted by June 9, 2011**. 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.

### **Background Information:**

In the 5<sup>th</sup> 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 4th posting and suggestions made during the Quality Review. Changes made were:

#### TOP-001-2:

- Update to the definition of Reliability Directive based on the efforts of Project 2006-06 which is responsible for the content of the definition
- Clarification to Requirement R2 that it is an 'identified' Reliability Directive that is in question. Plus, the Time Horizon was adjusted to add 'Operations Planning'.
- Grammatical change to Requirement R3 changing 'of' to 'by'.
- Grammatical change to Requirements R5 and R6 to eliminate the use of 'coordinate'.
- Change 'local' area reliability to 'internal' area reliability in Requirement R8.
- Change the VRF for Requirement R9 from High to Medium.
- Clarification in Requirement R11 that 30 minutes is the timeframe for the indicated SOLs.
- Deleted Requirements R12 & R13 as they will be covered in Project 2009-02.
- Corresponding wording changes were made to the Measures and VSLs to match the revised wording in the Requirements.
- Fix a typo in Measure M10.
- Updated the Compliance Enforcement Authority language.
- Fixed the language in the VSL for Requirement R3 to match the actual requirement language.
- Clarify the intent of the SDT with regard to the VSL for Requirement R5.

#### TOP-002-3:

- Adjusted the Purpose Statement.
- Clarification to the rationale provided for Requirement R1.
- Made grammatical changes to Requirement R2 and updated 'local' to 'internal' as per TOP-001-2.
- Changed 'reliability' to 'registered' in Requirement R3.
- Added 'while not an IROL' to Measure M2.
- Made corresponding language changes to the Measures and VSLs to match the language changes in the Requirements.
- Updated the Compliance Enforcement Authority language.
- Clarified the intent of the SDT with regard to the VSL for Requirement R3.

TOP-003-1:

- Grammatical changes to Requirement R1.
- Added 'Transmission Operator' to Requirement R4 and eliminated Requirement R5.
- Added 'web postings' to Measures M2 and M3.
- Clarified Measure M4.
- Updated the Compliance Enforcement Authority language.
- Eliminated a redundancy in the VSL for Requirement R2.

**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 SDT made changes to TOP-001-2 in response to industry comments and the Quality Review process. This includes all aspects of this standard – requirements, measures, and data retention. Do you agree with the changes the drafting team has made?

If you do not support these changes or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments.

Yes

No

Comments:

We disagree with the statement in R8 ". . . have been identified by the Transmission Operator as supporting its internal area reliability . . .". This statement puts an SOL on the same level as an IROL, which is not the intent of an SOL. The Transmission Operator should inform the Reliability Coordinator of IROL's that may impact the reliability of the BES, but not SOL's.

R9 - We continue to believe that SOL's should not be a part of the TOP-001-2 standard. There are not identified timeframes in the NERC standards that apply to SOL's. There has been no basis for the 30 minute timeframe listed, as "generally accepted by the industry" is not a technical basis, and SOL's are often tied to thermal limits and other steps can be taken locally to offset the SOL. 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. 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."

Including SOL's in R11 effectively makes them equivalent to IROL's for mitigation purposes. Consistent with our comments in R8 and R9, SOL's must either be removed from consideration, or more narrowly defined to the appropriate set of SOL's that directly impact the reliability of the BES (cause instability, uncontrolled separation, or cascading outages).

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

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The SDT should ensure that TOP-001 consistent with FAC-014-2 R2 concerning identification of SOLs.

2. The SDT made changes to TOP-002-3 in response to industry comments and the Quality Review process. This includes all aspects of this standard – requirements, measures, and data retention. Do you agree with the changes the drafting team has made?

If you do not support these changes or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments.

Yes

No

Comments: NSRF believes that the boundaries are not identified in TOP-002-3 R2. For IROs, the boundaries should be limited to the Registered Entities footprint.

3. The SDT made changes to TOP-003-1 in response to industry comments and the Quality Review process. This includes all aspects of this standard – requirements, measures, and data retention. Do you agree with the changes the drafting team has made?

If you do not support these changes or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments.

Yes

No

Comments:

As currently written, R1.1 could be interpreted to include all of the distribution facilities of a Registered Entity. It needs to be revised to include only the lower voltage facilities proven to impact the reliability of the BES.

In R1.1, please clarify “long-term” as the term applies to outage of BES Facilities. What length of time must pass before an outage I is considered “long-term”?

In R1.1, clarify “Operating Parameters” as the term applies to BES Facilities and those Facilities at voltages lower than the BES. We recommend that a list of required parameters be included within the Requirement.

Recommend rewording R2 (and R3) as follows: “Each Transmission Operator shall distribute its data specification document to all NERC Registered Entities that provide Facility status to the Transmission Operator.”

4. The VRF, VSL, and Time Horizons are part of a non-binding poll. Do you support the proposed VRF, VSL and Time Horizon assignments?

If you do not support these assignments or you agree in general but feel that

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

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alternative language would be more appropriate, please provide specific suggestions in your comments.

Yes

No

Comments:

5. If you have any other comments on this Standard that you have not already provided in response to the prior questions, please provide them here.

Comments: