



**DRAFT MEETING AGENDA**  
**MIDWEST RELIABILITY ORGANIZATION**  
**Standards Committee**

Midwest Reliability Organization Corporate Office – Roseville, MN  
September 3, 2009 – 10:00am

- 1) Call to Order**
  - a) *Determination of Quorum*
  - b) *Additions to the Agenda*
  - c) *Standards of Conduct and Anti-Trust Guidelines*
  
- 2) SC Report**
  
- 3) Consent Agenda**
  - a) *Approve Meeting Minutes of May 21, 2009*
  
- 4) NERC Standards Committee and Subgroup Vacancy Update**
  
- 5) Standards**
  - a) Standards Process Manual for Organizational Standards – Carol Gerou
  - b) Four Regional Standards Update – Tom Mielnik
  
- 6) Midwest Reliability Organization Reports**
  - a) NSRS Report – Carol Gerou
    - i) Membership lack of participation in the NSRS
    - ii) Revised NSRS Charter
    - iii) Weekly Meeting
    - iv) Webpage Changes
    - v) Need to replace Jim Haigh from WAPA
  - b) Standards Manager Report – Carol Gerou
  - c) Compliance Committee Update – SC Member
  - d) Reliability Assessment Committee Update – SC Member
  
- 7) NERC Reports**
  - a) Interchange Subcommittee – Shane Jenson
  - b) Standards Committee – Carol Gerou
  - c) Compliance and Certification Committee – Terry Bilke
  - d) Regional Reliability Standards Working Group – Carol Gerou
  - e) NERC Drafting Teams
    - i) Assess Transmission Future Needs Standards Drafting Team – Tom Mielnik
    - ii) Disturbance Monitoring Standards Drafting Team – Joe DePoorter
    - iii) Violation Severity Levels Drafting Team – Mike Brytowski
  
- 8) Task List Review**

**9) Other Business**

a) Standards Committee Report to Board of Directors – September 24, 2009

b) Meeting dates for 2009

September 24, 2009, MRO Board of Directors Meeting

November 17, 2009, Compliance Committee Meeting

November 18, 2009, Reliability Assessment Committee Meeting

November 19, 2009, Standards Committee Meeting

December 2, 2009, MRO Reliability & Compliance Workshop - TBD

December 3, 2009, MRO Board of Directors Meeting

**10) Next Meeting/Future Locations**

a) September 24, 2009, MRO Board of Directors Meeting – Holiday Inn Select

b) November 17, 2009, Compliance Committee Meeting – Holiday Inn Select

c) November 18, 2009, Reliability Assessment Committee Meeting – Holiday Inn Select

d) November 19, 2009, Standards Committee Meeting – Holiday Inn Select

e) December 2, 2009, MRO Reliability & Compliance Workshop – Holiday Inn Select

f) December 3, 2009, MRO Board of Directors Meeting -TBD

**11) Adjourn**

**Agenda 1**  
**Call to Order**

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**Agenda 1  
Call to Order**

*a. Determination of Quorum*

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**Midwest Reliability Organization  
Standards Committee  
2009 Roster**

<b>Name</b>	<b>Sector</b>	<b>Company</b>	<b>Term</b>
Wayne Guttormson	Canadian Utility	Saskatchewan Power Corporation	December 2009
Mike Garton	Generator and/or Power Marketer	Dominion Resources Services, Inc.	December 2009
Gerry Steffens	Municipal Utility	Rochester Public Utilities	December 2009
Dave Rudolph	Cooperative	Basin Electric Power Cooperative	December 2010
Lloyd Linke	Federal Power Marketing Agency	Western Area Power Administration	December 2010
Larry Larson	Investor Owned Utility	Otter Tail Power Company	December 2010
Kavita Maini	Large End-Use Electricity Customer	Wisconsin Industrial Energy Group	December 2010
Jason Shaver	Transmission System Operator	American Transmission Company	December 2010
Joe Knight Vice Chair	Cooperative	Great River Energy	December 2011
<b>Dave Acton Vice Chair</b>	Investor Owned Utility	Alliant Energy	December 2011
Tim Noeldner	Municipal Utility	Wisconsin Public Power, Inc.	December 2011
Carol Gerou Secretary		Midwest Reliability Organization	

**Agenda 1**  
**Call to Order**

*b. Additions to the Agenda*

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**Agenda 1  
Call to Order**

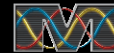
*c. Standards of Conduct and Anti-Trust Guidelines*

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## Standards of Conduct

FERC Standards of Conduct prohibit MRO staff, committee, subcommittee and task force members from sharing non-public transmission sensitive information with anyone who is either an affiliate merchant or could be a conduit of information to an affiliate merchant.

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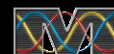


## Anti-Trust Reminder

Participants in Midwest Reliability Organization meeting activities must refrain from the following when acting in their capacity as participants in Midwest Reliability Organization activities (i.e. meetings, conference calls, and informal discussions):

- Discussions involving pricing information; and
- Discussions of a participant's marketing strategies; and
- Discussions regarding how customers and geographical areas are to be divided among competitors; and
- Discussions concerning the exclusion of competitors from markets; and
- Discussions concerning boycotting or group refusals to deal with competitors, vendors, or suppliers.

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**Agenda 2**  
**SC Report**

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**Agenda 3**  
**Consent Agenda**  
*Approve Meeting Minutes of May 21, 2009*

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**DRAFT MEETING Minutes**  
**MIDWEST RELIABILITY ORGANIZATION**  
**Standards Committee**

Midwest Reliability Organization Corporate Office – Roseville, MN  
May 21, 2009 – 10:00am

**1) Call to Order**

a) *Determination of Quorum*

Acting Secretary Dan Schoenecker determined that a quorum was met at 10:03am.

The following members, guests and MRO Staff were present at today's meeting:

<b>Members</b>	
Dave Acton, Chair, Alliant Energy	Gerry Steffens, RPU
Joe Knight, Vice Chair, GRE	Tim Noeldner, WPPI
Wayne Guttormson, Sask Power	Larry Larson, OTTP (Conference Call)
Mark Garton, DRS	Jason Shaver, ATC (Conference Call)
Lloyd Linke, WAPA	Dave Rudolph, BEPC (Conference Call)

<b>Guests</b>	
Jose Medina, NextEra Energy	Tom Mielnik, MEC (Conference Call)
Stuart Hansen, FERC	Dave Jacobson, MH (Conference Call)
Andy Puztai ATC (Conference Call)	Jodi Jensen, WAPA
Terry Bielke, MISO (Conference Call)	Chuck Lawrence, ATC (Conference Call)

<b>MRO Staff</b>	
Dan Schoenecker, Acting Secretary	Laura Elsenpeter (am only)
Mike Brytowski	Jo Anne McNabb
Carol Gerou	

<b>Members Absent:</b>	
Kavita Maini, WIEG	

b) *Additions to the Agenda*

No other additions to the agenda at this time.

c) *Standards of Conduct and Anti-Trust Guidelines*

Dave reviewed with the committee the Standards of Conduct and Anti-Trust Guidelines.

**2) Chair Report – Dave Acton**

Dave provided a handout to the committee and discussed his chair report. He

outlined to the MRO Board of Directors his concern regarding the drafting of voluntary procedures and guidelines by the MRO. The Board requested that these procedures and guidelines be distinctive so they can be differentiated from the mandatory standards.

Dave also talked about the four regional standards; bringing attention to the time and effort spent thus far to obtain NERC approval.

### **3) Consent Agenda**

#### *a) Approve Meeting Minutes of March 5, 2009*

Joe Knight requested minor changes be made to the minutes which were accepted by the rest of the committee.

***Upon motion duly made by Lloyd Linke and seconded by Gerry Steffens, the Standards Committee unanimously approved the minutes of the March 5, 2009 Standards Committee meeting.***

### **4) NERC Standards Committee and Subgroup Vacancy Update**

#### **a) Disturbance Monitoring Standard Drafting Team**

Dan Schoenecker reminded the committee that there is an opening on this drafting team. If anyone is interested, please let Dan Schoenecker know.

### **5) Standards**

#### **a) Standards Process Manual for Organizational Standards – Review current status and Board feedback**

Dave lead the discussion by addressing some of the issues with respect to maintaining this manual. Voting has not been resolved for Organizational Standards. It was decided that when the committee resolves the voting methodology and then the manual could be approved.

#### **b) Four Regional Standards Update – confirm SC action at last meeting – provide direction to drafting team**

Dave briefly touched on this subject as a part of his report to the Board of Directors. The Board's recommendation is that we need to ensure these standards have been vetted by the Standards Committee.

#### **c) MRO UFLS Regional Standard Update (provide firm direction to SDT) Chuck Lawrence**

Chuck briefed the committee on the drafting standards and the developments since the last Standards Meeting. Based on the complexity of the drafting process with respect to the progress made thus far, it was recommended that the drafting team get together and finalize the comments and bring them back to the committee and determine the next step.

Dave Jacobson and Tom Mielnik joined the meeting via conference call to discuss the current status of the organizational standards. The four standards were submitted to NERC but required modification to become clearer. The MRO board approved the standards and sent them to NERC. NERC reviewed

the standards and sent them back to MRO to incorporate the new format and improve the clarity. Comments were received on the rewritten standards, but they have not been reviewed.

**The committee recessed for lunch as 12:00pm**  
**The committee reconvened at 12:50pm**

d) Fill-in-the-Blank and MRO Regional Standards Discussion Status

Dan Schoenecker informed the committee that these were the original standards, drafted by members from each region. For these four standards, we should find out where it is in the work plan and determine what's "fill-in-the-blank" and proceed from there.

The committee discussed at great lengths the definition of a regional standard versus a NERC standard and how this affects the initiatives of the various drafting teams.

Currently, four standards are out for comment. Tom suggested laying out questions and options to get feedback. If the ballot body rejects the comments, then they will come back to the standards committee.

i) PRC-002 – Define and Document Disturbance Monitoring Equipment

Work on this standard is moving forward.

ii) PRC-006 – Development and Documentation of Regional UFLS

See the comments provided by Chuck under item 5c.

iii) BAL-002 – Disturbance Control Performance (Update MBAL)

Work on this standard continues.

iv) PRC-012 – Special Protection System Review Procedure

Work on this standard continues.

**6) Midwest Reliability Organization Reports**

a) NSRS Report – Mike Brytowski

Mike outlined his NSRS Report which is included below.

**NSRS Update 5/20/09**

**Comments submitted by the NSRS on behalf of the MRO since March 5, 2009: (16)**

Project 2006-08 - Transmission Loading Relief, POC Terry Bilke, MISO

Project 2007-09 - Generator Verification - PRC-024-1, POC Terry Harbour, MEC

Project 2007-09 - Generator Verification - MOD-026-1, POC Ken Goldsmith, ALTW

Project 2007-11 - Disturbance Monitoring, POC Carol Gerou, MP

Project 2009-08 - Nuclear Plant Interface Coordination, POC Chuck Lawrence, ATC  
Project 2009-06 - Facility Ratings, POC Joe DePoorter, MGE  
Project 2006-04 — Backup Facilities, POC Joe DePoorter, MGE  
Project 2008-06 — Cyber Security — Order 706, POC Carol Gerou, MP  
Project 2008-14 — Cyber Security Violation Severity Levels, Carol Gerou, MP  
Reliability Standards Development Procedure, POC Joe Knight, GRE  
CIP Technical Feasibility Procedure, Eric Ruskamp, LES  
Project 2007-23 — Violation Severity Levels, Michael Brytowski, MRO  
Project 2007-03 — Real-time Operations, Pam Sordet, XCEL  
Project 2008-08 — EOP VSL Revisions, Michael Brytowski, MRO  
Project 2007-01 — Underfrequency Load Shedding, Chuck Lawrence, ATC  
Project 2009-01 — Disturbance and Sabotage Reporting, POC, Joe DePoorter, MGE

**Current Commenting: (3)**

Project 2009-18 — Withdraw Three Midwest ISO Waivers  
NERC's Three-Year Performance Assessment and Joint Regional Entity Self-Assessment Report, POC Terry Harbour, MEC  
Reliability Standards Development Plan, POC Carol Gerou, MRO

**Initial Voting Recommendations: (3)**

Project 2008-06 CIP-002-1-CIP-009-1 Revisions  
MRO Vote: Affirmative, Results: Quorum: 91.90%, Approval 84.06%  
Project 2006-03 EOP-001\_EOP-005\_EOP-006 System Restoration and Blackstart  
MRO Vote: Affirmative, Results: Quorum: 89.81%, Approval 76.63%

**Re-Circulation Voting Recommendations: (2)**

Project 2008-06 CIP-002-1-CIP-009-1  
MRO Vote: Affirmative, Results: Quorum: 94.37%, Approval 88.32%  
Project 2006-03 EOP-001\_EOP-005\_EOP-006 System Restoration and Blackstart  
MRO Vote: Affirmative, Results: Quorum: 92.08%, Approval 75.39%

**Interpretation Voting Recommendations: (3)**

Project 2008-18 Interpretation-Manitoba Hydro  
MRO Vote: Affirmative, Results: Quorum: 89.78%, Approval 92.62%  
Project 2009-10 Interpretation - CMPWG - PRC-005-1 R1  
MRO Vote: Affirmative, Results: Quorum: 92.70%, Approval 92.71%  
Project 2009-11 Interpretation WECC Reliability Coordination Subcommittee IRO-10-1  
MRO Vote: N.A., Results: Quorum: 88.64%, Approval 84.77%

**Recirculation Interpretation Voting Recommendations: (1)**

Project 2008-18 Interpretation-Manitoba Hydro  
MRO Vote: Affirmative. Results: Quorum: 95.56%, Approval 92.81%

**Standards Currently out for ballot: (0)**

None

**NSRS Roster Update:**

Carol Gerou is the new MRO Standards Manager and will be shifting from NSRS Chair to NSRS Secretary.

Michael Brytowski (MRO) will be leaving the NSRS

Pam Sordet (XCEL) has resigned from the NSRS.

Alice Murdock (XCEL) has asked to be on the NSRS

Opening for NSRS Chair

One opening for the NSRS

A motion was made by Jason Shaver to nominate Alice Murdock to the NSRS Committee.

***Upon motion duly made by Tim Noeldner and seconded by Gerry Steffens, the Standards Committee unanimously approved Alice Murdock to the NSRS Committee.***

a) Standards Manager Report – Dan Schoenecker

Dan introduced Carol Gerou to the Standards Committee as MRO's new Standards Manager. She will be the new secretary for this committee. Dan also announced the transfer of Mike Brytowski to the Compliance area at MRO. Dan also informed the committee that Mike has done an outstanding job with the transitioning of the Standards department and thanked him for his hard work. Dan also plans on getting Carol on the UFLS continent wide drafting team.

b) Compliance Committee Update – SC Member

Joe Knight shared a few notes from the Compliance Committee meeting. Joe also updated the committee on additional compliance initiatives that are taking place.

c) Reliability Assessment Committee Update – SC Member

Larry Larson updated the committee on the status of the RAC Committee. They held their meeting on May 20<sup>th</sup>, 2009. The RAC discussed the time involved on the guidelines for disturbance reporting and disturbance monitoring, citing that those guidelines should be distributed for comment soon. Larry also talked about the seasonal assessment and that things are moving along well.

**7) NERC Reports**

a) Interchange Subcommittee – Shane Jenson

No report

b) Standards Committee – Terry Bielke

Terry provided the committee his oral report on the efforts of the NERC standards. Jason asked about the VSL's? Terry has not seen anything yet. The drafting team has expressed their frustration in trying to develop the VSL's, while following the directives. FERC was expected to issue a

supplemental filing by the end of April; but we haven't seen anything yet.

c) Compliance and Certification Committee – Terry Bilke

Terry brief the committee on the activities of the CCC. They are looking for people to serve on several committee and subcommittees. He informed the committee that NERC is starting a new process for compliance inquiries adding that nothing has been made publicly available yet. There will be another CCC meeting in June. If you'd like to provide comments to him, please do so.

d) Regional Reliability Standards Working Group – Dan Schoenecker

***Dan reported on the recent meeting of this group, identifying activities of the regions on the fill-in-the-blank standards and regional standards development. Carol will represent MRO on this group going forward.***

e) NERC Drafting Teams

i) Assess Transmission Future Needs Standards Drafting Team – Tom Mielnik

No report.

ii) ATC-TTC-AFC-CBM-TRM Standards Drafting Team – Dennis Kimm

No report.

iii) Back-Up Facilities Standards Drafting Team – Blaine Dinwiddie

No report.

iv) Disturbance Monitoring Standards Drafting Team –

No report. Drafting team being formed.

v) Protection System Maintenance and Testing Standard Drafting Team – Carol Gerou

The standard is close to being done but wanted NERC comments. This should be posted soon.

vi) Violation Severity Levels Drafting Team – Mike Brytowski

VSL's to come out in a couple of weeks for balloting.

vii) Underfrequency Load Shedding -

The committee recommends that this drafting team suspend UFLS activities because of the uncertainty whether or not this will be a continental wide standard.

**8) Task List Review –**

Due to time constraints, this has been deferred until the next meeting.

**9) Other Business**

a) Standards Committee Report to Board of Directors – June 18, 2009

b) Meeting dates for 2009

June 17, 2009, MRO Reliability & Compliance Workshop - TBD

June 18, 2009, MRO Board of Directors Meeting

September 1, 2009, Compliance Committee Meeting

September 2, 2009, Reliability Assessment Committee Meeting

September 3, 2009, Standards Committee

September 23, 2009, Reliability & Compliance Workshop – TBD

September 24, 2009, MRO Board of Directors Meeting

November 17, 2009, Compliance Committee Meeting

November 18, 2009, Reliability Assessment Committee Meeting

November 19, 2009, Standards Committee Meeting

December 2, 2009, MRO Reliability & Compliance Workshop - TBD

December 3, 2009, MRO Board of Directors Meeting

**10) Next Meeting/Future Locations**

a) June 17, 2009, MRO Reliability & Compliance Workshop - TBD

b) June 18, 2009, Board of Directors - TBD

**11) Adjourn**

Gerry Steffens made a motion to adjourn the meeting which was seconded by Mike Garton. The meeting adjourned at 3:32 pm.

**Agenda 4**  
**NERC Standards Committee and Subgroup Vacancy Update**

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**Agenda 5  
Standards**

- a. Standards Process Manual for Organization Standards*
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**Agenda 5  
Standards**

*b. Four Regional Standards Update*

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**Agenda 5  
Standards**

*c. MRO UFLS Regional Standard Update – Provide Firm Direction to SDT*

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**Agenda 6**  
**Midwest Reliability Organization Reports**  
*a. NSRS Report – Carol Gerou*

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- i) Membership lack of participation in the NSRS
- ii) Revised NSRS Charter

**NERC Standards Review Subcommittee**

**CHARTER**

The MRO NERC Standards Review Subcommittee (NSRS) was established by the MRO Standards Committee (SC) to provide an efficient process for reviewing and providing comments during the NERC Standards development process and for other draft policies or processes open for comment, as directed by the MRO SC. The NSRS process clearly defines the various roles of those involved in developing these comments.

The NSRS is tasked with the role of conducting a review and comment process for all NERC Standard Authorization Requests (SAR) and Standards, and for Interpretations of existing Standards and policies that are posted for public comment. The NSRS will compile a voting recommendation based on the majority opinion of the NSRS membership. The recommended voting position will be forwarded to the MRO Regional Entity (RE) and the MRO stakeholders. The MRO registered entities, as a commenting group, will vote this position unless a dissenting opinion emerges.

NSRS may also review documents out for comment from other industry entities, such as FERC, DOE, NAESB or adjacent REs, on a case-by-case basis.

**Mission:**

The mission of the MRO NSRS is to provide a common platform for the MRO stakeholders to discuss and collaborate on NERC SARs, NERC Standards, Interpretations of existing Standards and for advising the MRO (and stakeholders) regarding the developed comments and voting recommendations.

**Scope:**

1. Establish a forum for discussion and collaboration on the development of NERC Standards, to include review of SARs, proposed new or modified NERC Standards, Interpretations of existing Standards, etc.
2. Establish a forum for discussion and collaboration on the development of voting recommendations for NERC ballots.
3. Be comprised of MRO stakeholders with experience in operating and planning from the electric utility industry.
4. Have an open and equal representation within the entire MRO geographical area.
5. Any MRO stakeholder can request to become a NSRS member via the NSRS Secretary and on the approval of the Standards Committee.

**NSRS Commenting Process:**

Comments need to reflect the concerns of all MRO members and MRO Committees and should identify all MRO members supporting such comments. The following is an initial description of the NSRS commenting process.

1. The NSRS Secretary will monitor the NERC web site to identify when NERC has opened an item for comment.
2. The NSRS Secretary will notify the NSRS that NERC has initiated a comment period and assign a Point of Contact (POC).

3. The NSRS POC will develop an initial Draft comment and incorporate comments from other NSRS members. Once all comments are compiled, the POC will forward the comment form to the NSRS Secretary for weekly NSRS conference call discussion.
4. Once the initial draft comments are completed, the NSRS Secretary will forward the comments to NERC and subsequently to the SC and non NSRS MRO members.
5. The NSRS Secretary will forward voting recommendations to the NSRS, SC, and non NSRS MRO members.

**NSRS Composition:**

The MRO has 10 sectors (listed below) and it is the intent to have equal representation from each sector.

Cooperative	(C)
Canadian Utility	(CU)
Federal Power Marketing Agency	(FMPA)
Generator and/or Power Marketer	(GPM)
Investor Owned Utility <3000MW	(IOU<)
Investor Owned Utility >3000MW	(IOU>)
Large End-Use Electricity Customer	(LEU)
Municipal Utility	(MU)
Regulatory Participant	(RP)
Transmission System Operator	(TSO)

**Responsibilities:**

The MRO NSRS ensures the proposed new or modified NERC Reliability Standards are vetted through the MRO region by facilitating comments, positions, and voting recommendations, while following rules established by the NERC Reliability Standards Development Procedure.

The MRO NSRS will fulfill the commenting requirement by commenting as a group. All NSRS members will be listed by default as supporting the comments. In the event that a NSRS member doesn't support the comment(s), they may elect to be removed from the comment form by making a request to the NSRS secretary.

Each MRO NSRS member may vote independently as there are no NERC group voting capabilities.

**Organization:**

1. NSRS reports to the MRO SC.
2. The process is open to the public.
3. Conference calls will be conducted weekly.
4. The Chair position will be a member of the subcommittee.
5. The Secretary will be a MRO staff member.

**Deliverables:**

1. Recommend comments concerning SARs.
  2. Recommend comments concerning proposed new or modifications to existing NERC Standards.
  3. Recommend voting positions.
  4. Comment on other documents as requested by the MRO SC Chair, NSRS members, or interested MRO stakeholders.
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- iii. Weekly Meetings
  - iv. Webpage Changes
  - v. Need to replace Jim Haigh from WAPA

**Agenda 6**  
**Midwest Reliability Organization Reports**  
*b. Standards Manager Report – Carol Gerou*

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**Agenda 6**  
**Midwest Reliability Organization Reports**  
*c. Compliance Committee Update – SC Member*

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**Agenda 6**

**Midwest Reliability Organization Reports**

- d. Reliability Assessment Committee Update – SC Member*
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**Agenda 7**  
**NERC Reports**

*a. Interchange Subcommittee – Shane Jenson*

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Date: 10 Aug 2009

To: MRO

From: Shane Jenson, OPPD

Re: Report for NERC Interchange Subcommittee meeting 6-7 Aug 2009

**Summary of Actions Taken by NERC Interchange Subcommittee:**

1. Reviewed and edited Requirements sections of INT standards that are being updated as directed per NERC Project 2008-12. The INT Standards Drafting Team met before the Interchange Subcommittee. Delineating entity (sink BA, source BA, intermediate BA, reliability coordinator, transmission service provider, etc) responsibilities was a significant focal point.
2. Wrote detailed Measurement criteria for each of the updated INT standards. Delineating entity (sink BA, source BA, intermediate BA, reliability coordinator, transmission service provider, etc) responsibilities was a significant focal point.
3. Discussed the possibility of implementing an Eastern Interconnection wide checkout tool based on industry feedback.

**Summary of Direction Provided:**

1. None.

**Next Steps:**

1. Continue working thru each and every one of the INT standards and submit the completed documents for comment and approval. This overhaul of the INT standards is a major project that will be the focus of the NERC Interchange Subcommittee for several meetings.
2. Continue working thru each and every one of the INT standards and submit the completed documents for comment and approval. This overhaul of the INT standards is a major project that will be the focus of the NERC Interchange Subcommittee for several meetings.
3. Write final report. There was significant industry pushback due to several regions already having tools in place. They didn't want to spend much time and money to adapt to an Eastern Interconnection "universal" checkout tool. The final report will attempt to leverage that which is already common to the majority of in-place tools, thus requiring minimal changes.

## Agenda 7 NERC Reports

*b. Standards Committee – Carol Gerou*

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### NERC Standards Committee

June 4, 2009 1-4 PM EST

Conference Call

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#### 3. Nominations

- Project 2009-01 (“Disturbance and Sabotage Reporting”) – Needs Canadian candidates. SC wants requester’s name included on roster for team.
- Project 2008-16 (“Cyber Security Order 706”) – NERC is looking for candidates.

#### 4. Standards Activities Status Reports

- 3 NERC projects are behind schedule; names were not given. No NERC projects were added since last meeting.
- SC wants to review interpretation filter. Linda Campbell (FRCC) indicated that there was a new interpretation process waiting BOD approval and field testing. The SC was concerned since companies are using the interpretation process to determine if they are complaint.
- [http://www.nerc.com/docs/standards/sar/Project\\_Status\\_Summary.xls](http://www.nerc.com/docs/standards/sar/Project_Status_Summary.xls)
- [http://www.nerc.com/docs/standards/sar/Project\\_Summary\\_Calendar.xls](http://www.nerc.com/docs/standards/sar/Project_Summary_Calendar.xls)

#### 5. Standards Actions

- Project 2009-02 (“Real Time Tools”) – A motion was made to form SAR SDT. SC plans to ask CCC through Interface Subcommittee to comment on whether this “proposed” standard should be a “certification” or “reliability” standard. If these standards are added under the certification requirements, entities who are already certified can’t be audited on them; there are no requirements for a re-certification process. Compliance-certification questionnaire goes to different level than certification.

#### 6. Coordination

- The SC was questioned if they will create a subgroup to review FERC filings that NERC and industry supported but FERC didn’t support? For example VAR-001.
- Alberta has approved 13 standards. British Columbia is acting finally. Quebec has signed MOU to enforce standards; their enforcement will be similar to Manitoba.
- The Regional Managers have created a white paper on the causes of violations of PRC-005. NERC to issue survey to get a better handle of critical assets since criticality depends on the application. Region’s budgets have been posted.

#### 7. Other Issues and Actions

- The Reliability Standards Development Procedure. Prior to 30-day pre-ballot view posting the procedure needed to be corrected – wording changes on page 9 and who can authorize CIP action was added.

- Notice to CCC that the SC authorized shortening the pre-ballot window for the V1 Cyber Security VSLs.

#### **8. Executive Committee Actions**

- Project 2008-06 (“Cyber Security – Order 706”) – A motion was made to have a representative of this SDT to give status report at the SC July Meeting in Vancouver.
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## **NERC Standards Committee**

July 15-16, 2009

Vancouver, Canada

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#### **4. Standards Activities Status Reports**

- Modified Reliability Standards Development Plan 2010-2012 will be posted in August. Next draft will be presented to SC in September. Scott Henry wants all requirements assessed to determine if they are needed.
- Alice Murdock (Xcel Energy) wants more structure and development of RSAWs. Allen Mosher wants compliance staff involved in the RSAW development. The SC wants the SIS of the CCC to address consistencies among regional and NERC RSAWs plus, SIS should propose a parallel for the CCC to make sure this group assesses all RSAWs.
- Project 2007-18(“Reliability Based Control”) – Standard will replace current CPS2 requirement and supplement existing CPS1 requirement; this standard will be an Eastern Interconnection Standard.

#### **5. Standards Actions**

- Version 5 of the Functional Model was approved for comment period. Jim Cyrulewski (FMWG) gave presentation: 1. Whether to include Demand Resources under Planning Coordinator or in the Generator Owner/Operator functions, 2. All Planning functions were reviewed and clarified for a wide area perspective, 3. Terminology is made consist with other NERC glossary of terms, Statement of Compliance Registry Criteria, etc.,& 4. Entities are now called “Responsible Entity”. SC will be asked to approve on October 7, 2009.

#### **6. Coordination**

- NRC and NERC are developing a MOU expected to be completed in Mid-September. NRC will be involved in CIP audits and exceptions. 706B Implementation Plan will be balloted with enough time for NERC BOT to vote on in September. Consideration paper will go through informal process.
- British Columbia has approved 103 standards.
- Keith O’Neil – FERC staff plans to participate in SDT meetings; these meetings will be publically announced. The fourth Thursday of every month will be an open meeting. Observers will not be able to ask questions.
- Tim Gallagher (Regional Managers) – Metrics should be added to NERC’s 3 year assessment to determine if NERC activities are appropriate.

#### **7. Other Issues, Actions, and Discussion Items**

- SC has formed a task force to review the interpretation process. All CWS & regional processes will be reviewed but emphasis will be given to the intersection of the informal and formal processes. Scott Henry wants collaboration with stakeholders. Task force to have recommendations ready for SC's September meeting.
- When can an entity withdrawal an interpretation request? Is it allowed to and if so when? Maureen Long said after the interpretation is drafted and entity can't withdrawal. (NERC Standards Process Manual doesn't speak to withdrawal of an interpretation.)

**Note:** Mr. Newbauer (or person decided upon by Gerry Adamski) is invited to explain why the NERC alert pertaining to COM-002 was issued. NERC SC wanted to know review process for NERC alerts. Alice Murdock (Xcel Energy) asked, "Where is the accountability for review of NERC alerts, mind set, approach, roles, and responsibilities?" And, wants this NERC alert withdrawal.)

## NERC Standards Committee

August 13, 2009 1-4 PM EDT

Conference Call

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### 3a. Drafting Team Vacancies

- Project [2007-02](#) ("Operating Personnel Communications Protocols") – Seeking an individual with physical security experience and an individual with cyber security experience.
- Project [2007-05](#) ("Balancing Authority Controls") – Seeking individuals from the FRCC region and Market segment.
- Project [2007-12](#) ("Frequency Response") – Seeking individuals from FRCC region and individuals representing Transmission Dependent Utilities (TDU).
- Project [2008-06](#) ("Cyber Security"- Order 706) – Seeking individuals from any segment or region with experience implementing cyber systems in substations and/or generation stations.
- Project [2008-12](#) ("Coordinate Interchange Standards") – Seeking an individual from a Transmission Dependent Utility that is experienced with tagging, scheduling, and checking out Interchange.

### 5a. Coordination with FERC and other regulatory authorities

- VSL and BOT activities were filed with the commission. There's been a number of public and in person meetings to discuss Transmission Planning, Backup Facilities, Vegetation Management, and System Protection Coordination Standards.

### 6a. Report from MRC and BOT Meetings

- The COM-002 Alert plus the CIP compliance questionnaire (This CIP compliance questionnaire asked about nuclear facilities when these facilities currently are not applicable to the CIP-002 through CIP-009 standards.) was discussed by the BOT & MRC.
- The NERC BOT remanded VAR-001 decision since Canadian members may be disadvantaged.
- Rick Sergel comments posted on webpage.
- BOT to focus on clarifying standards. People on Process Subcommittee are helping to include efforts in Standards Development Reliability plan.

- Next BOT conference call Standards Committee will report efforts to clarify standards.

**6b. Response to letter from Rick Sergel to Standards Committee regarding COM-002 advisory**

The Operating Personnel Communications Protocols SDT (NERC project 2007-02) will address what is a "directive" via an urgent action standard. This motion was not finalized and will be completed via email ballot since some members had left the meeting. The definition should include normal and/or emergency circumstances plus they want all applicable standards that would be impacted by a definition considered.

**Agenda 7**  
**NERC Reports**

*c. Compliance and Certification Committee – Terry Bilke*

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Meeting Notes  
Compliance and Certification Committee

June 10, 2009 | 1:30–5:00 p.m.  
June 11, 2009 | 8 a.m.–5 p.m.  
Marriott Toronto Airport  
901 Dixon Road  
Toronto, ON.

**NERC Antitrust Guidelines**

**1) Committee Business**

**a) Approve Minutes of March 11–12, 2009 Meeting Minutes Tom Abrams**

**b) Nominating Committee – Candidate for RE-SERC Position John Blazekovich**  
TDU, SERC and IOU had vacancies. The following people were nominated and approved for the vacancies.

TDU- Mark Ringhousen  
SERC - Gregory Pierce  
IOU- Howard Rulf

**c) Review of CCC Action Items Tom Abrams**

NERC standards staff will report deviations to the RSDP along with a mitigation statement.

**d) ERO Developments Summary David Hilt**

**e) Self-Certification of NERC Adherence to Rules of Procedure for the:**

**Compliance Monitoring and Enforcement Program David Hilt**

NERC couldn't attest to several of the items as they haven't done audits of all the REs who are the primary ones carrying out the function.

There was an exception where one Region was maintaining only evidence of non-compliance rather than all evidence.

NERC deviated from the Rules of Procedure (which says all standards must be audited) in that they did not audit all standards.

NERC has not set up a program to verify the findings of audits conducted by REs as required by the Rules of Procedure.

NERC will have an external audit of itself done this year in addition to the one conducted by the CCC's EROMS' audit of the standards process.

## **Organization Registration & Certification Program David Hilt**

### **f) Self-Certification of NERC Adherence to the Reliability Standards Applicable to NERC - Mike Assante**

Mike didn't attend the meeting.

### **g) Meeting Updates from the BOT and MRC Clay Smith**

#### **MRC**

- New chair of the MRC (Steve Nauman)
- Mark Lauby presented the LT reliability assessment-emerging issues.
- NERC looking for CEO level participant for the CIP ESG.
- The new Operating Reliability Data agreement was presented to meet FERC's need for data.
- PRC-005 will be a pilot project for the alert process. FAC-008 will be next.
- NERC was asked if raw survey responses for the NERC self-assessment. NERC just provided examples and summaries.
- A lot of attention and government interest (FERC, DOE, NIST, Senate) on cyber security.
- NERC is seen by the industry as a FERC-centric organization, but should be more independent.

#### **BOT**

- BOT approved CIP 2-9.
- Approved the CCC's procedures (hearings, appeals, monitoring the ERO for adherence to CMEP and RSDP).
- NERC Standards Process is not meeting the 45 day requirement for processing interpretations.[fair amount of CCC debate on this point on who should be developing interpretations and the need for them to be public]

### **h) Update on Rules of Procedure Section 500 / Appendix 5 Posting Clay Smith**

The CCC is supposed to be responsible for approving changes to the registration and certification procedure. The CCC provided staff an updated copy of section 500 and Appendix 5 based on work by the Organization Registration and Certification Subcommittee (ORCS). NERC made significant changes to documents and posted them for public comment stating that this was the CCC's work. NERC posted a redlined version whose previous version was never available to the industry. There was no revision history available similar to what is in the standards process. NERC apparently has removed previous public comments and have taken the position that they don't need to address all comments.

The CCC will review industry comments. The CCC leadership has already started discussion with the BOT.

### **i) Changes Required in Rules of Procedure Regarding the Readiness Evaluation Program - Clay Smith**

This question was raised since things were quiet since the FERC raised this issue during the NERC budget filing.

Linda Campbell noted that neither the REs nor NERC put anything in their budget.

**j) Summary of Status of CCC Programs and Procedures Tom Abrams**

**k) 2010 CCC Work Plan Clay Smith**

A draft of the 2010 CCC work plan should be coming out in a few weeks.

**Qualifications and Training for CCC Observers of NERC's Audits of Regional Entities and Observer Roster Update - Clay Smith**

Clay also discussed the changes to the process for auditing REs. These audits are done by an independent auditor. The CCC has an observer on the audit team appointed by the CCC chair. The REs can object to the observer.

One question is what is done if the CCC member identifies something amiss or if the RE disputes the findings and appeals. Would the observer be able to convey their observations to the CCC? Seems like they should be able to.

**CCC Hearing Roster Update Tom Abrams**

The CCC has an obligation to conduct hearings related to CMEP. About half the CCC is on the roster for people eligible to be on a hearing panel. Terry Bilke and Earl Cass are on the list.

**2) CCC Subcommittees**

**a) Standards Interface Subcommittee John Blazekovich**

There were 7 volunteers for the Compliance Elements Development Resource Pool. These people will be lined up for the training developed by the SIS. Upon completion

There is a SAR posting for "real time tools". The question is whether this is more of a certification issue. The SIS will assign someone to track this.

NERC posted changes to the Rules of Procedure.

SIS working on audit worksheets to evaluate NERC's conformance to following the rules of procedure. Audit will be later this year.

The SIS was asked to look at the PRC-23 NOPR with regard to FERC's proposals regarding VRFs and VSLs.

**Binary Requirements Recommendation to VSL Drafting Team - SIS**  
working on this.

**b) ERO Monitoring Subcommittee Tom Burgess**

**Initial Stakeholders Perception Survey on NERC's Performance**

**Report for the BOT on the Stakeholder Survey**

The CCC ran an internal survey on NERC's running of the CMEP. This will be given to the BoT. The EROMS expects to run this annually.

## **Status of CCCPP-008 and CCCPP-010**

On-site Audit of the Reliability Standards Development Procedure

**c) Organization Registration and Certification Subcommittee Update Patti Metro** - See discussion above on "Rules of Procedure Section 500 / Appendix 5 Posting"

**d) Procedures Subcommittee Matt Goldberg**

**Confidentiality Protocol** – This is a procedure the subcommittee is working on for CCC and subcommittee members who will be dealing with confidential information in fulfilling their obligations.

**Conflict of Interest, Work History, etc. for CCC Observers on Regional Audits** - Working on procedures for CCC members who are observers on RE audits.

Pending Updates to Rules of Procedure

### **3) ERO CMEP Updates**

**a) Regional Operations Joel deJesus**

Joel manages the regional delegation agreements and also provides audit oversight, to include NERC's audits of the REs.

NERC recently developed a pro-forma settlement process, intended to move things quicker. Joel expects future changes based on comments.

CIP self-certification. Next one is in July. There are some additional questions being asked about critical assets (nuclear generation, etc.).

RFC audit just completed. SERC underway. MRO is in August. NPCC in October. The CCC has some concern of the duration of the RE audits. They are multi-week evolutions right now.

**b) Compliance Violation Investigations and Compliance Inquiries Earl Shockley** Earl wasn't at the meeting. Dave Hilt responded to Terry's questions.

This is a follow-up from the previous meeting. Earl briefly discussed this new process at the last CCC meeting. There is no public information on this. As of two weeks ago, there are 19 open CVIs and 9 CIQs.

Terry asked NERC to consider providing CCC updates of summary statistics on the # of CIQs, new ones, and closed ones.

We have no issue with CIQs in concept. If the number grow or become pseudo-CVIs, there should be some changes to the Rules of Procedure to lay out the due process for these.

Dave noted it is a triage process to determine if an investigation is warranted. Some of the Regions are doing this. Dave will talk to Earl about how to make some information available. They will also look at providing CCC statistics.

c) **Enforcement and Mitigation** Tim Kucey

FERC staff participate on all the CVIs (in some cases multiple people). NERC generally only participate in the more significant events or if the RE is tied up.

Dave noted the Rules allow them to take testimony under oath.

CIP-004 recently bubbled up as one of the most violated standards.

d) **Registration and Certification** Craig Lawrence

NERC is converting their database. Registration is working with standards to resolve issues with generators (being registered as TOPs).

The Regional Entity working group is requesting data to ensure there are no registration gaps.

Most certification lately deals with footprint changes.

NERC will be the recipient of RC compliance data.

e) **Compliance Reporting, Analysis and Tracking** Mike DeLaura

- The data presented was the same as what was provided at the last BoT Compliance Committee (about a month old).
- Total active violations 1756, 109 closed.
- SERC has closed the largest percentage.
- About half of all violations have closed mitigation plans.
- 91 new violations in March.
- About 35% of violations are dismissed.
- About half of the violations are documentation related.
- A little more than half the violations are self-reported, about 1/8 are found during self-certification.

Dave noted FERC is auditing WECC right now.

Dave described the "Short Form" settlement process used for lower-moderate VRF/VSLs, primarily documentation related. Dave noted the settlement document is posted on their website.

FERC apparently says that reporting violations in a self-certification should not receive mitigation consideration.

#### 4) NERC Initiated Issues

#### 5) Member Initiated Issues

**CIQ-Items** (Terry Bilke-see above)

#### **Request for summary of violations and causes.** (Terry Bilke)

This is a follow-up from the previous meeting. The Regions and NERC are starting to put out statistics on most violated standards. People are interested in seeing additional detail (which specific requirements are being violated and what are the things that are tripping people up).

### **Compliance and Regional Entities developing interpretations (Matt Goldberg)**

Joel and Dave were asked about the compliance bulletins (audit guidance the regions develop, but presently isn't available to the registered entities). If we're dealing with a reliability issue, these should be transparent (the goal should be getting people to be in compliance not trap them). Also, these things should contain a disclaimer that they outline "one way" to demonstrate compliance, not the only way. Dave Hilt says that NERC is also creating these bulletins or industry advisories based on statements in FERC Orders. There was concern in the CCC that this is changing standards outside the standards process. Dave mentioned that NERC Compliance and NERC legal use Webster's dictionary as the based on defining terms in the standards (example was to define "directive" to interpret what communications need to be 3-way). Dave Hilt noted all operational communication are considered directives and must be 3-way. This raises a problem when you consider the RSAWS as the entity to list all directives issued in the last year.

### **NERC use of data collected for offsite power restoration (Matt Goldberg)**

NERC made a filing on data it collected on restoration time from recent simulations. There is wording in the filing that NERC will use the data to enforce compliance. Dave Hilt noted he hasn't been following the issue.

Dave further talked about the compliance guidance bulletins NERC has developed for the RE auditors. There have been 3 developed related to standards.

### **CIP Technical Feasibility Exceptions (TFE) (Clay Smith)**

NERC has a proposed change to the Rules of Procedure regarding TFEs. NERC believes that TFEs be approved by NERC before they are put into place. NERC probably doesn't have the staff to do this nor has it the expertise to evaluate the exceptions on the various cyber systems. Under the proposed rules, if NERC doesn't respond in 60 days, NERC feels you'd be in non-compliance. Dave Hilt noted that the most significant comments received on the draft changes to the RoP is that non-response by NERC within 60 days should not cause non-compliance.

### **Other Items**

The nominating committee was extended through September.

### **6) Review Action Items from the Meeting Tom Abrams**

### **7) Adjourn Tom Abrams**

**Agenda 7**  
**NERC Reports**

*d. Regional Reliability Standards Working Group – Carol Gerou*

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## **Regional Reliability Standards Working Group**

June 1, 2009 2:00 PM – 4:00 PM EST

Conference Call

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### **3a Impact of FERC Approved Standards on the fill-in-the-blank standards**

Two NERC standards with overlapping requirements may cause double jeopardy.

Areas of concern - Model Building (such as data collection for generators' exciters.) and Disturbance Monitoring.

To resolve issue, have SDT request NERC to deal with double jeopardy or SDT create an implementation plan to phase out conflicting standards.

Dan Schoenecker introduced NERC's Compliance-Enforcement matrix indicating which Mandatory requirements can't be enforced.

**Side note:** Docket RR07-11-000 dated June 7, 2007 and Final Order 672 addresses how to handle double jeopardy among regional standard and NERC standard.

### **3b Review and Discuss the NERC Regional Standards Evaluation Procedure**

Bob Millard suggested two comment periods for a regional standard. The first comment period would be within the region and it would resolve the technical issues.

The Second comment period would be at the NERC level and it would resolve the process issues. (Plus, the second comment period would not be as long as the first comment period.)

Majority of the RRSWG thought, the RRSWG should come to an agreement as far as a common process.

### **4a Standard Development Work plan**

1. Work plan schedule needs updating to show actual versus estimated.
2. The fill-in the blank standards should be address as soon as possible but may conflict with higher priority projects relating to blackout recommendations and interpretations.
3. Work plan needs to be updated.

**Agenda 7**  
**NERC Reports**  
*e. NERC Drafting Teams*

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- i. Assess Transmission Future Needs Standards Drafting Team – *Tom Mielnik*
- ii. Disturbance Monitoring Standards Drafting Team – Joe DePoorter

Greetings,

The Disturbance and Sabotage Reporting SAR Drafting Team (SARDT) met in Chicago, Ill. on July 21st and 22nd. The SARDT reviewed comments that were received concerning SAR Project 2009-01, that entails the revising of existing Standards, CIP-001-1 Sabotage Reporting and EOP-004-1 Disturbance Reporting to eliminate redundancies and provide clarity on sabotage events.

All comments were satisfied and will be forwarded to the yet to be established Standard Drafting Team (SDT). The scope of the SAR was increased to include DP, GO, and TOs (per comments received) since this would give the SDT the flexibility to include these entities if the SDT determines they fall within the applicability of the yet to be written Standard(s).

At this point, the SARDT and NERC will not be re-posting the Project 2009-01 for another round of comments. The SAR will be forwarded to the Standards Committee for inclusion into the Sept. 2009 agenda. Thus, this will lead to the establishment of a Project 2009-01, SDT in the near future.

Respectfully Submitted,

Joe

Project 2009-01, SARDT member, representing the MRO.

Joseph DePoorter  
Reliability Compliance Manager  
Madison Gas and Electric Company

email: [jdepoorter@mge.com](mailto:jdepoorter@mge.com)  
phone: 608.252.1581  
fax: 608.252.1537

- iii. Violation Severity Levels Drafting Team – *Mike Brytowski*

**Agenda 8**  
**Task List Review**

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**Agenda 9**  
**Other Business**

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- a) Standards Committee Report to Board of Directors – September 24, 2009
- b) Meeting dates for 2009

September 24, 2009, MRO Board of Directors Meeting

November 17, 2009, Compliance Committee Meeting

November 18, 2009, Reliability Assessment Committee Meeting

November 19, 2009, Standards Committee Meeting

December 2, 2009, MRO Reliability & Compliance Workshop - TBD

December 3, 2009, MRO Board of Directors Meeting

**Agenda 10**  
**a. Next Meeting/Future Locations**

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- a) September 24, 2009, MRO Board of Directors Meeting – Holiday Inn Select
- b) November 17, 2009, Compliance Committee Meeting - TBD
- c) November 18, 2009, Reliability Assessment Committee Meeting - TBD
- d) November 19, 2009, Standards Committee Meeting - TBD
- e) December 2, 2009, MRO Reliability & Compliance Workshop – Holiday Inn Select
- f) December 3, 2009, MRO Board of Directors Meeting - TBD

**Agenda 11**  
**Adjourn**

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