Unofficial Comment Form

Standards Efficiency Review

Do not use this form for submitting comments. Use the Standards Balloting and Commenting System to provide feedback on the **Standards Efficiency Review (SER) Standards Authorization Request**. Comments must be submitted by **8 p.m. Eastern, Wednesday, September 26, 2018.**

Additional information about this project is available on the project page. If you have questions, contact Standards Developer, Laura Anderson (via email) or at 404-446-9671.

Background

Many NERC Reliability Standards have been mandatory and enforceable for 10+ years in North America. Phase 1 of the SER project seeks to identify requirements that are potential candidates for retirement because they are no longer essential for reliability. Retiring these requirements would increase efficiencies by reducing regulatory obligations and/or compliance burden. Using a risk-based approach, three SER teams [Real-time Operations (RT), Long-term Planning (LT), and Operations Planning (OP)] evaluated the reliability benefit of each requirement in the body of NERC Reliability Standards. Based on the analyses, the SER teams are recommending the requirements listed in this posting be retired. The SER Team maintains that these requirements can be retired without impacting any other standards; i.e., no modifications to other requirements in other standards are necessary. Phase 2 of the SER Project will focus on modifying and/or consolidating requirements throughout the body of standards.

Questions

1. Do you agree with the recommendations and rationales to retire the proposed requirements? If not, please state the standard(s) and requirement number(s) in your response(s) along with your rationale(s) for not retiring the requirement(s).

   ☒ Yes

   ☐ No

   Comments:

2. Do you agree that NERC should proceed with this project?

   ☒ Yes

   ☐ No

   Comments:

TAPS appreciates the work of the Standards Efficiency Review Teams in developing this SAR. We believe the justifications for the SAR's proposed retirements are well-explained. We also believe, however, that several additional requirements should be retired either as part of this SAR or in Phase 2, as set forth below.

COM-001-3 R1, R2, R3, R4, R5, R6, R7, R8, R9, R10, R11, R12, and R13 (ALL)

Basic functionality. This should be part of the certification process for BAs, TOPs and RCs. For all other entities (DPs and GOs), it is not necessary to require communication to be proven as the RC, TOP or BA will assure that they can make contact with these entities, and all entities have internal and external Interpersonal Communications Capabilities. This Standard basically states to have primary and back up communications (a phone). In today's world, basic, daily functionality necessitates multiple avenues of communications such as a land line phone, a cell phone, text messaging, a radio, satellite phone, etc. This Standard is not necessary for reliability; it only enforces a compliance "gotcha" if a registered entity's primary communication system fails. There is not a reliability benefit from COM-001-3, just administrative burden. Communications are a basic function of every registered entity. The entire Standard should be retired.

COM-002-4 R3

R1 protocols cover all aspects of operating protocols. If communication is a reliability-related task, then training is covered in PER-005.

COM-002-4 R4

R4 and its subrequirements are a control and should not be an auditable item.

COM-002-4 R5, R6, R7

There should be no difference between an Operation Instruction under normal conditions and under Emergency conditions. R1 covers all Operating instructions. By imposing additional requirements on Operating Instructions that are issued during an emergency, R5, R6, and R7 make it necessary for entities to track whether each Operating Instruction was issued during an Emergency or during normal operations, in order to be able to demonstrate compliance. This administrative burden does not enhance reliability.

EOP-005-3 R3

Verify through NERC Certification program.

EOP-008-2 R2

Verify through NERC Certification program.

EOP-008-2 R3, R4

NERC Certified Operators can be addressed through Certification Program. R6 addresses Primary and Backup and can also address the sub-bullets in this Requirement. Sub-bullets of R4 can be addressed in R8.

EOP-010-1 R2

This is for situational awareness only and may be a mitigating feature of R1. If one K warning is not sent out, it becomes a non-compliance issue. This is also covered in EOP-011-1, R1.2.1.

EOP-010-1 R3.1

R3.1 is contained in R1. Per part 3.1, this will force the TOP to prove a negative if they did not receive any space weather information. Part 3.2 starts the mitigating processes for GMD events and part 3.3 concludes them. Part 3.1 is administrative in nature as alone, it does not accomplish anything; parts 3.2 and 3.3 mitigate the GMD. Recommend part 3.1 be retired. If not retired, part 3.1 should be modified to clearly state in the requirements or measures that proof of compliance is to show the steps only and entities are not required to prove a null set of data.

EOP-011-1 R1 subparts

R1.1 does not enhance or enforce reliability; it is only an auditable item. R1.2.2, R1.2.3, R1.2.4, R1.2.5, and R1.2.6 are all actions or event types that require actions. These are all event-specific. The Operating plan will just say that the operator will do something to mitigate these events. Then it becomes an auditable item in the Operating Plan, only. R1 is simple enough: have a plan for emergencies. Recommend subcomponents be retired.

EOP-011-1 R2 subparts

R2.1 does not enhance or enforce reliability; it is only an auditable item. R2.2.3 and its parts and R2.2.4, R2.2.5, R2.2.6, R2.2.7, R2.2.8 and R2.2.9 are all actions or event types that require actions. These are all event-specific. The Operating plan will just say that the operator will do something to mitigate these events. Then it becomes an auditable item in the Operating Plan. R2 is simple enough: have a plan for emergencies. Recommend subcomponents be retired.

EOP-011-1 R4

This is common sense. We do not need a Requirement to state that we have a specific time to update something issued by the RC. The RC can simply state have an update back by a certain time. This becomes a time "gotcha" issue during an audit or self report. This does not support system reliability.

EOP-011-1 R5

This is in line with the justification for retiring R4, as this is also common sense. The RC will act immediately on all emergency notifications. The time frame of 30 minutes only become an auditable point and does not support reliability. If the requirement is not retired, at minimum the 30 minute criterion should be deleted.

EOP-011-1 R6

This is clearly stated in the Functional model under Real Time actions and does not need to be contained here; the RC will act immediately on all emergency notifications. Recommend retirement of this Requirement.

FAC-002-2 R2, R3, R4, R5

Inherent in R1.

FAC-003-4 R4

R4 is a notification process only, without the next step of clearing happening. This alone does not support reliability. The clearing of the encroaching vegetation does support reliability and is covered in R1, R2, and R6.

FAC-008-3 R1, R2, R3, R6

Generator Facility Ratings are not useful as they are often different from the capability determined through MOD-025. This Standard is usually based solely on the nameplate ratings of components that are covered by this Standard. Nameplate ratings become irrelevant with MOD-025-2, which captures the true capabilities of the asset. The TP will be notified of MOD-025-2 findings. If the RC wants to know the MOD-025-2 capabilities, then they can ask for it under IRO-010-2. The TOP can also request the same information under TOP-003-3.

IRO-001-4 R1

This is the basic functionality of an RC, as outlined in the Functional Model.

IRO-001-4 R2

Per the Functional Model, the BA, TOP, and GOP have reliability interactions with the RC, hence supporting a secure and stable reliable system. The DP does not receive instructions from the RC; rather, they receive information from the BA and TOP.

IRO-001-4 R3

This does not need to be a Requirement. The RC can simply ask whether the registered entity has the ability to accomplish the task. If the entity can't, the RC will take alternate actions.

IRO-002-5 R3

Requirement 2 already provides for two active paths. A NERC certification program can ensure that the paths are being used periodically.

IRO-008-2 R3

The RC's performance of the analysis is identified in R1. A separately enforceable requirement that the RC take the common-sense action of informing impacted entities is unnecessary.

IRO-008-2 R4

IRO-018-1 R2, when implemented, will address RTA quality. The quality process could also assure RTA activity in accordance with utility practice (RTA, RTA backup, etc) without a hard standard-based 30 minute compliance threshold. Candidate for NERC certification program.

IRO-008-2 R5

This requirement supports R2 and process can be verified through NERC Certification (process review).

IRO-010-2 R3

Real time data transmission involves telemetry for thousands of points scanned or updated every few seconds. Retaining evidence of providing this volume of data is burdensome.

MOD-033-1 R2

This requires demonstration of the negative and after the fact validation. This should be part of the Event Analysis process and not a NERC Requirement.

NUC-001-3 R9

Requirement is administrative as it only specifies what must be in the agreement. R9 can be moved to a Guidance document since R9's second bullet states "The Nuclear Plant Generator Operator and the Transmission Entity are responsible for ensuring all the R9 elements are addressed." An item can be addressed by stating that it is not applicable for the entity.

PER-003-1 R1, R2, R3 (ALL)

This Requirement is predicated on the NERC exam which is the responsibility of NERC and the PCGC, not a Registered Entity. Recommend this Standard be retired. Operators are trained on competencies. Competencies can be verified through the training Standards. Certifications should be verified through the NERC Certification program.

PER-004-2 R1

In addition to being redundant with PER-003-1 (which we also recommend be retired), this requirement is part of the Certification process and does not need to be within a Standard.

PER-004-2 R2

Already covered by IRO-009 R1/R2.

PER-005-2 R5, R6

Operations Support Personnel know their impact on reliability and the task list. The prep and training used for OSP and the trainers is better spent for their job duties in support of reliability.

PRC-002-2 R1-R12 (ALL)

Disturbance monitoring is for post-event analysis and does not have direct impact on reliability. Guidelines and best business practices are sufficient to help improve accuracy and coordination. This very granular and prescriptive standard is not needed.

PRC-004-5(i) R2, R3, R5

Only R1 and R6 are required in order to support system reliability and stability. This Standard has too many time frames within each requirement and only provides a compliance gotcha if not followed. Time frames don't support reliability. The intent of this Standard is if you have a mis-operation that you notify everyone involved and fix it so it (hopefully) doesn't happen again.

PRC-005-6 R5

For PRC-005 Unresolved Maintenance Items (UMIs) are a low-volume and low-risk population with little to zero proven actual risk. We are not aware of any events where UMIs were cited as a primary or contributory cause to a BES outage in the Events Analysis program. Given the low volume of actual documented risk impacts and the low volume of self-logs or spreadsheet Notice of Penalty (SNOPs and NOPs), the UMI definition and requirement should be retired. If not retired, the UMIs should be modified to clearly state in the requirements or measures that compliance by exception is allowed and that regulated entities are not required to prove a null set of data.

TOP-001-4 R1

The basic functionality of a TOP is to operate or direct operation of equipment to maintain reliability. COM-002-4 clearly indicates that the TOP will be using Operating Instructions. Please see responses re IRO-001-4 for additional retirement justification.

TOP-001-4 R2, R4-R7

Please see responses re IRO-001-4 for retirement justification.

TOP-001-4 R3

Requirement language is poorly worded because it is not specifically tied to Operating Instructions issued under TOP-001-4 R1 (i.e., Operating Instructions issued to maintain reliability). As such, every entity in R3 must maintain a list of every Operating Instruction issued or received, whether the OI was issued for reliability or not. The NERC Glossary of Terms definition for Operating Instruction pulls in all orders given to others to change the state of a BES Element, which means all planned switching orders issued by the operator, not just OIs issued for reliability. This requirement would be improved by both limiting the duration Operating Instruction evidence needs to be retained and clarifying that the requirement applies only to OIs from TOP-001-4 R1. The RSAW for TOP-001-4 R3 must also be corrected because it directs the audit to begin with the list of "all" Operating Instructions. Please see responses re IRO-001-4 for additional retirement justification.

TOP-001-4 R8

Covered by EOP-011 R5 or can be merged with same Requirement. Please see responses re IRO-001-4 for additional retirement justification.

TOP-001-4 R9

EMS quality codes suffice for notifications of RTU outages and were accepted by the RRO. However, the Regional Entity does not agree. So now unplanned outages need to be tracked for 30 minute overages for reporting. This detracts from reliability and does not enhance reliability, especially when these outages are already indicated by quality codes. Please see responses re IRO-001-4 for additional retirement justification.

TOP-001-4 R13

TOP-010-1 R3, when implemented, will address RTA quality. The quality process could also assure RTA activity in accordance with utility practice (RTA, RTA backup, etc.) without a hard Requirement-based 30-minute compliance threshold. Candidate for NERC Certification program.

TOP-001-4 R21

R20 already provides for two active paths and could address the concept of using the alternate periodically. A NERC certification program can ensure that the paths are being used periodically.

TOP-001-4 R24

R23 already provides for two active paths and could address the concept of using the alternate periodically. A NERC certification program can ensure that the paths are being used periodically.

TOP-002-4 R3

The TOP's performance of the analysis is required by R1. A separately enforceable requirement that the TOP take the common-sense action of informing impacted entities is unnecessary. Could be verified through NERC certification.

TOP-002-4 R4, R5, and R7

Daily Operating Plans are not needed for BAs. Generation dispatch information can be gathered and shared through data provision requirements.

TPL-007-1 R1

Administrative.

VAR-001-4.1 R1

Duplicative of FAC-014.

VAR-001-4.2 R5

All of R5 appears to be administrative and a common-sense operations item. All entities keep impedance and tap information on their transformers. There isn't any reason to withhold information if requested, so a mandatory standard backed by sanctions to provide information within 30 days is simply an administrative clock. It's wasteful of both entity and regulator resources.

VAR-002-4.1 R3

Duplicative of other standards requiring data provision. There is no justification for the 30 minute timing requirement; if a timing requirement is retained, it is not a good reliability practice to require notification "within 30 minutes," but only if status is not restored within 30 minutes.

VAR-002-4.1 R4

Duplicative of other standards requiring data provision. There is no justification for a 30 minute time limit and this becomes a compliance trap.

VAR-002-4.1 R5

Duplicative of other standards requiring data provision.