

Unofficial Comment Form

Standards Efficiency Review

Operational Data Simplification Standard Authorization Request

The Standards Efficiency Review (SER) Phase 2 Team seeks industry input on the draft [Operational Data Simplification Standard Authorization Request](#) (SAR). **Do not** use this form for submitting comments. Use the [Checkbox survey](#) to submit comments by 8:00 p.m. Eastern, Monday April 27, 2020. Please coordinate feedback into a single response for each organization or entity.

Additional information about the project is available on the [SER project page](#). For more information or assistance, contact Senior Standards Developer, [Chris Larson](#) (via email) or at (404) 446-9708.

Background

The scope of SER Phase 2 effort is to evaluate NERC Reliability Standards (O&P and CIP), as informed by implementation experiences and compliance practices, to develop and recommend standards-based solutions intended to reduce inefficiencies and unnecessary regulatory burdens for the purpose of supporting continued safe, secure and reliable operations.

Questions

1. Do you believe there is an opportunity for efficiency gain outlined in the SAR?

Yes

No

Comments: TAPS strongly supports the purpose of this SAR and the development of a risk-based approach to entity compliance. TAPS members are typically on the receiving end of data specifications and currently experience uncertainty on the effort needed to demonstrate compliance with the current zero-defect requirements. While we acknowledge that the ERO has discretion to take a risk-based approach to compliance monitoring, registered entities must comply with every applicable Requirement. Under the currently-effective data specification standards, entities that receive data specifications could be expected to demonstrate perfect performance with respect to every item in each data specification. This need to generate and retain evidence to demonstrate perfect compliance can result in excessive administrative inefficiencies for our members. For example, currently, an auditor could request evidence that certain real-time data was sent every 3 seconds on a randomly-selected date during the audit period, or a registered entity could be asked to show voluminous telemetry data demonstrating that no unreported outages occurred. A properly-crafted risk-based approach would significantly reduce the burden on registered entities, while still protecting reliability.

2. Do you agree a clarification of expectations is needed for the core BES reliability-related tasks and associated "data specification"?

Yes

No

Comments: TAPS members strongly support the proposed “top-down” approach to clarify the tasks in the standards. TAPS members believe the current IRO-010 and TOP-003 standards provide a one-stop source for entities to get the data they need for Operational Planning Analysis, Real-time Assessments, Real-time Monitoring, and Balancing Authority Analysis—the BES reliability-related tasks that drive IRO-010 and TOP-003 data specifications. As NERC said in its petition for approval of (among others) IRO-010-1a, which used the same top-down approach as IRO-010-2 and TOP-003-3:

[t]he requirements in the standard specify a formal request as the method for the Reliability Coordinator to explicitly identify the data and information it needs for reliability; and require the entities with the data to provide it as requested. This method is sound because _the Reliability Coordinator is the only entity that knows what data it needs to properly perform its reliability tasks, and the most efficient format for accepting this data_.

Docket No. RM10-15, at 35 (Dec. 31, 2009) (emphasis added). Much more recently, NERC stated in its April 6, 2020 comments on FERC’s NOPR regarding the Phase 1 SER retirements (RM19-16 and RM19-17, at 9 (emphasis added)):

Reliability Standards MOD-032-1, IRO-010-2, and TOP-003-3 provide the entities responsible for the reliable modeling, planning, and operation of the BPS with the authority to obtain the information they need from Generator Owners and Transmission Owners to complete their reliability tasks, which may include next most limiting equipment information. _Now that these broader data specification standards are in place, NERC has identified no reliability need to maintain additional requirements expressly requiring the provision of this data in the FAC-008 standard_.

TAPS agrees with NERC that the standards it cites give RCs, TOPs, and BAs the authority to get the information they need to carry out their reliability tasks. That is equally the case whether the information at issue is identification of next most limiting equipment, weather-related operational constraints, or real-time operating data.

We are concerned that much of the history behind the data specification concept is being forgotten; and as a result, drafting teams are reverting to specifying the information that must be provided on a continent-wide basis. This overly-prescriptive approach would result in reliability standards being revised constantly to chase moving targets with every new technology or risk that emerges. These standards can be precise with respect to the information to be requested, or they can be accurate; they cannot be both, and accuracy has to be the priority. The data specification should be flexible enough to evolve with risks and technologies, as well as being flexible enough to apply in the varying operational environments across the continent.

TAPS believes that clarification of the scope of the four BES reliability-related tasks identified in the SAR would allow the data specification to simply reflect what each RC, BA or TOP needs to perform

those tasks based on its particular operational environment, and that doing so should alleviate the concerns behind recent attempts to add a detrimental amount of specificity to the standards. Based on confusion among stakeholders, it appears that clarification of acceptable types of data (i.e., whatever the requesting entity needs) and formats/methods of transfer (i.e., anything—SCADA/ICCP, telephone, email, etc.—so long as it is mutually agreeable) is also necessary.

3. Do you agree with the secondary purpose of the SAR, which is evaluating the retirement of duplicative operational data exchange requirements dispersed in other standards?

Yes

No

Comments: This SAR is a recommendation from the Standards Efficiency Review project and directly supports the overall project goal by identifying “potential candidate requirements that are not essential for reliability, could be simplified or consolidated, and could thereby reduce regulatory obligations and/or compliance burden.” To the extent that the industry determines that requirements dispersed in other standards appropriately fall within the ambit of IRO-010 and/or TOP-003 data specifications, those requirements can be proposed for retirement.

4. Do you recommend any specific language revisions to the SAR?

Yes

No

Comments: The drafting team should consider adding a Cost Impact Assessment to the SAR.