



NERC/Regional Reliability Status Update

March 2010

Standards	Project	Activity	Due Date
NERC	Standards Process Manual	Comment	03/12/2010
	<p>Staff agrees with the intention of the changes but has serious concerns about the risk that the changes can be implemented incorrectly.</p> <p>Introduction of NERC staff providing “Quality” oversight. This could become a NERC veto .</p> <p>Concerned with the implementation of ALR as THE definition of reliability for all standards.</p> <p>Use of Technical Writer – must be assigned to 3rd party and NOT left open to a NERC staffer filling the function.</p> <p>Interpretations must be revised to filter out issues best left out of the Industry vetting process. Should consider deleting process entirely.</p>		
Various BAL, CIP, EOP, FAC, IRO, MOD, PER, PRC, TOP, and VAR standards	Project 2010-07 – Transmission Requirements at the Generator Interface	Comment	3/15/2010
	Comments pending		



NERC Standards Activities

Standards	Project	Activity	Due Date
Various CIP standards	Project 2010-09 – Cyber Security Order 706B Nuclear Plant Implementation Plan	Comment	03/15/2010
	Comments pending		
TOP-001-1	Interpretation of TOP-001-1 R8 by FMPP	Ballot	3/16/2010
	Question 1: Staff agrees with the rationale provided on balancing during emergencies but believes the Interpretation is not clearly written.		



NERC Standards Activities

Standards	Project	Activity	Due Date
VAR-001 & VAR-002	Project 2008-01 – Voltage and Reactive Planning and Control	Comment	03/26/2010
	Comments pending		
CIP-004-2	Project 2009-23 – Interpretation - CIP-004-2 – Cyber Security - Personnel and Training-Requirement R3	Pre-Ballot Review	03/29/2010
	Comments pending		
FAC-003-2	Project 2007-07 – Vegetation Management (draft 3)	Comment	03/31/2010
	Comments pending		

Standards	Project	Activity	Due Date
EOP-001-1	Interpretation 2010-04 — Interpretation of EOP-001-1 R2.4 for FMPP	Pre-Ballot Review	04/05/2010
	<p><i>Question 1: Staff agrees that Restoration Plans for BA relates to Balancing.</i></p> <p><i>Question 2: Staff agrees that the BA Plans must comply with applicable sections of EOP-005.</i></p>		
TOP-002-2a	Interpretation 2010-03 — Interpretation of TOP-002-2a R2, R8, and R19 for FMPP	Pre-Ballot Review	04/05/2010
	<p><i>Standard needs to be totally reviewed not just interpreted.</i></p> <p><i>Question 1: Staff agrees that R2 is NOT measureable.</i></p> <p><i>Question 2: Staff agrees that R8 is for TOP.</i></p> <p><i>Question 3: Staff agrees that if BA uses tools that the tools must be accurate. However, there needs to be a definition for “accurate”.</i></p>		

Standards	Project	Activity	Due Date
TOP-003-1	Interpretation 2010-02 — Interpretation of TOP-003-1 R2 for FMPP	Pre-Ballot Review	04/05/2010
	<i>Question 1: Staff agrees with Interpretation that BA is NOT responsible for planning and coordinating voltage relays</i>		
TOP-006-2	Interpretation 2010-01 — Interpretation of TOP-006-2 R1.2 and R3 for FMPP	Pre-Ballot Review	04/05/2010
	<i>Question 1: Staff agrees with Interpretation that BA is responsible for generation reporting and that TOP is responsible for transmission reporting</i> <i>Question 2: Staff questions Interpretation applies to relays that “impact” entity which seems to expand obligations (more to come)</i>		



Regional Standards Activities

Standards	Project	Activity	Due Date
	RFC		
	No activities at this time		
	SERC		
	No activities at this time		

Item	Activity	Due Date
<p>WEQ Member Ratification for Recommendation WEQ 2009 AP Item 5.b - Modify NAESB definitions to address internal inconsistencies and inconsistencies with the NERC</p> <p><i>PJM supports the modifications</i></p>	Ballot	03/24/2010

- The compliance audit covered 40 Standards, encompassing 307 requirements
- The CIP Compliance Spot Check included all 13 current requirements
- Substantial Pre-work – over 40K pages of evidence submitted

- 24 Auditors
 - 6 From FERC (3 - CIP)
 - 3 from NERC (1 - CIP)
 - 4 from SERC (1 CIP) remainder were RFC (3 CIP)
- Many with direct PJM Member experience
- NERC present to “observe” RFC and SERC
- FERC present to “observe” NERC, Regions, PJM
- Observers were participants

- **COM-002, R2 – Three Part Communications**
 - Based on 1 incident out of over 300 submitted
- **VAR-001 R2, R9 – Reactive Resources**
 - Based on one event involving pre-contingency voltages on radial portion of the 115kV system

- Not an issue for discussion during the Audit
- PJM set the stage for our operating relationship
- NERC pushed the issue-RFC staff intervened
- Not an issue for CIP-002 – as it was for ERCOT
- RFC Leadership still in support of our registration
- Value in our TOP/TO structure
- Future FERC discussions?

- **Agreements with Neighbors**
 - RTO to RTO JOA vs. TOP to TOP/BA
- **Communications with Neighbors**
 - TOP to TOP vs. RC to RC
- **TPL – Planning Standards**
 - PC & TEAC Records
- **PRC-001 – Relay Coordination**
 - Relay Subcommittee Work

- PJM's definition/application of SOLs to facilities 230 kV and above vs. all BES facilities
- Post Contingency Local Load Relief Warnings (PCLLRW)
- Performance of TOP tasks/duties by non-PJM personnel
 - 138 kV capacitor switching/operation
 - system restoration

- Value of “Compliance Bulletins”
- Evidence Mapping
 - All Versions of Everything?
 - What is Too Much?
- Quality of Evidence
- Preparation
 - Tour
 - Opening Presentation
 - SME’s in Navigating the Evidence
- Rapid and Organized Response to RFI’s

- SOL Definition – May need to evolve
- Some additional operator training
- Refinements to the TOP/TO Matrix
- Future TOP/TO Discussions with Regulators

- Quarterly Meeting
 - May 19, 2010
 - August 19, 2010
- Next Monthly WebEx
 - March 18, 2010

- Questions?

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Note the underscore between Regional and Compliance.

- Reliability Standards

http://www.nerc.com/filez/standards/Reliability_Standards_Under_Development.html

- NAESB Calendar of Events

http://naesb.org/monthly_calendar.asp