MINUTES
PJM Interconnection
Reliability Standards and Compliance Subcommittee

Monthly WebEx
Thursday, August 15, 2013
10:00 A.M. EDT

1. Call to Order:
Reliability Standards and Compliance Subcommittee Secretary Thomas Moleski called the meeting to order at 10:00 a.m.

a. Members Attending:
Stephanie Monzon (Chair)  PJM Interconnection
Thomas Moleski (Secretary)  PJM Interconnection
Eric Adolfsen          RC Cape May Holdings, LLC
Kenneth Brown          PSEG Energy Resources and Trade LLC
Kathy Caignon          Vineland Municipal Electric Utility
Bernita Clover          Duquesne Light Company
Hugh Conley            FirstEnergy Solutions Corporation
Daniel Duff            Liberty Electric Power, LLC
Christy Gedman         Essential Power LLC
Mark Godfrey           PEPCO Holdings, Inc.
Chris Hoopes           Constellation
Sandra Hopkins (ES)    Dominion Virginia Power
Stephen Knapp          Power Generation Services, Inc.
Christy Koncz          Public Service Electric & Gas Company
Joyce Leya             Duquesne Light Company
John Loftis            Virginia Electric & Power Company
Connie Lowe            Dominion Virginia Power
Dan Maul               Midwest Generation, LLC
Larry Raczkowski       FirstEnergy Solutions Corporation
John Reed              FirstEnergy Solutions Corporation
Joe Roettker           Duke Energy Ohio, Inc.
Bruce Samblanet        Appalachian Power Company
Chris Scanlon          Commonwealth Edison Company
Thomas Smith           City of Cleveland, DPU, Div of Cleveland Public Pwr
Robert Thomas          Illinois Municipal Electric Agency
David Thorne           Potomac Electric Power Company
Brenda Truhe           PPL Electric Utilities Corp. dba PPL Utilities
b. PJM Staff:
William Harm       PJM Interconnection
Bradley Hofferkamp PJM Interconnection
Srinivas Kappagantula PJM Interconnection
Mark Kuras        PJM Interconnection
Megan McLaverty   PJM Interconnection
Cathy Wesley      PJM Interconnection
Thomas Hauske     PJM Interconnection
Mark Sims         PJM Interconnection
Mike Herman       PJM Interconnection


c. Administrative Documents
Mr. Moleski referred to the Antitrust Guidelines, the Compliance Disclaimer, and the Media Guidelines that were included with the Agenda. There were no questions on the documents as presented.

d. Today’s Agenda
1) The agenda was approved as amended

e. Minutes
The minutes from the July 19, 2013 meeting were approved as presented.

2. PJM Compliance Activities:
Mr. Moleski led a discussion on the following compliance activities

1) Standing Updates:
   i. TO/TOP Matrix Subcommittee Update (Mr. Kappagantula)
      1. Next meeting scheduled for August 22, 2013
      2. Two New Standards to be discussed for inclusion into V7 of TO/TOP Matrix
         a. EOP-004-2  - effective 01/01/2014
         b. VAR-001-3  - effective 01/01/2014
   ii. PJM Manual Updates
      1. M-1 – Attachment B changes (Mr. Kappagantula)
         a. Substantial changes were made to Attachment B of Manual 1 to facilitate PJM’s compliance to EOP-005-1 and EOP-008-2
         b. Frequency, method of delivery, and due dates are all listed.
         c. A red lined version of Attachment B is available in the materials posted for this meeting.
2. M-12 Changes from the SRSTF Proposal (Mr. Hauske)
   b. Changes to Schedule 6A Black Start Service Tariff were filed with FERC on July 9, 2013
   c. Manual 12 changes
      i. PJM in collaboration with the Transmission Owner designates Black Start Generators
      ii. Critical Black Start Unit Requirement is two (2) per zone and 110% of Critical Load
      iii. PJM to consider Cross Zonal Opportunities for Black Start Generation
      iv. Restriction of no more than Three Black Start Units at a Station Eliminated.
      v. Black Start Generators must have the ability to close to a Dead Bus within Three (3) Hours (with some exceptions).
      vi. Transmission Owners may procure additional Black Start above PJM Criteria but will be compensated outside PJM’s Tariff.
      vii. Process will be developed for PJM/TO Disagreement.

iii. FERC Audit Update (Ms. Monzon)
    1. PJM’s second quarterly report submitted on July 2nd.
    2. Overall completion of 86% of all recommendations.
    3. Significant remaining Recommendations
       i. Benchmarking the EMS model – PJM’s Modeling Group has already reached out to the Transmission Owners for assistance
       ii. Virtual backup for the EMS

2) PRC-006-1 – Automatic Underfrequency Load Shedding. (Mr. Sims)
   i. Effective October 1, 2013
   ii. Responsible Entities
      1. Planning Coordinators Transmission Owners Distribution Providers
   iii. Work began in 2012 w/ existing modeling data supplied by the TOs
   iv. Criteria and Design work largely completed.
   v. RFP let out to bid for study – vendor selection likely in about 2 weeks
   vi. Likely that changes identified that will require new equipment, or upgrades to existing equipment will be an input to the Regional Transmission Expansion Planning Process (RTEPP) and approved by the Transmission Expansion Advisory Committee (TEAC) and the PJM Board.

3) Ms. Truhe discussed the GridEx II exercise scheduled for November 13-14, 2013.
   i. The objectives are to exercise the current readiness to respond to a cyber incident and provide input for security program improvements to the bulk power system.
   ii. GridEx administrators will publish a list of players and nomenclature to be used, before the start of the drill.
   iii. There will be points in the exercise where participants will be required to contact their neighbors, Reliability Coordinator, Transmission Operator, etc. Only other players should
be contacted during the exercise. A number of members identified their companies as participants, observers, or monitors.

iv. Mr. Godfrey will forward a link to the website for the exercise.

4) Mr. Moleski reviewed the refreshed RSCS Charter and Workplan.

i. RSCS Charter
1. The attempt to incorporate a NAESB section into the early RSCS meetings was poorly received. RSCS population is almost exclusively Operations and Compliance oriented. All references to NAESB work were deleted from the Charter.
2. The TO/STOP matrix development and the GO/other matrix development references were struck as there are other groups performing this function. The RSCS will still review and comment on their work products as appropriate.
3. References to development and submission of SARs, and formal requests for interpretation to standards were eliminated as that isn’t a focus of the RSCS work. However, there’s nothing in the Charter that prohibits us from this activity if we see a need in the future.
4. Mr. Moleski will work with Mr. Scanlon on additional changes and resubmit the Charter for the approval of the Subcommittee at their next meeting.

ii. RSCS Workplan
1. Minor comments were received on the Workplan from the Subcommittee.
2. Mr. Brown suggested that a group of members be tasked to visit the Workplan quarterly to find areas that should be brought before the Subcommittee. The Subcommittee will consider this at their next meeting.
3. Extended discussion on how the Subcommittee should process Manual changes. Mr. Brown suggested that one possibility could be to establish a subgroup to work with their SOS counterparts to review upcoming manual changes for compliance implications. Mr. Moleski will work with Mr. Brown over the next few weeks to develop possible strategies. The Subcommittee will discuss this at their next meeting.
4. Mr. Moleski will clean up the Workplan and resubmit it for the approval of the Subcommittee at their next meeting.

5) Mr. Moleski reviewed the 2014 RSCS Meeting Schedule.
   i. The April 18th meeting was moved from April 18th to April 11th.
   ii. The 2014 RSCS Meeting Schedule was approved as amended.

6) Mr. Moleski reviewed the tentative plans for proposed online forum for use by the RSCS
   i. Forum will initially be used to distribute PJM’s positions on standards that are being balloted. Many possible avenues for expansion.
   ii. No details available at this time. Mr. Moleski will update the Subcommittee as this program develops.

7) Mr. Moleski will review the PRC-001 Self Report Mitigation Plan.
   i. Final Phase of Mitigation Plan - Due to be completed by September 30, 2013
   ii. Each TO will develop and implement training for the engineers that issue relay settings. This training will cover the necessary coordination requirements as found in the *PJM Coordination of Protection on Shared Facilities* document.
   iii. Draft training presentation was distributed on May 30, 2013
1. Mr. Moleski will forward a copy to the RSCS.
iv. 3 of 13 companies have already completed the training of their protection staffs.
v. Ms. Monzon noted that this was the first Mitigation plan of its type. It was developed by PJM and the Relay Subcommittee. Future plans will include the RSCS.

8) PERCS Website (Mr. Kappagantula)
i. Changes requested by the RSCS have been agreed to, but have not yet been implemented yet. Mr. Kappagantula will report his progress to the RSCS.

9) MOD-031 (MOD C) Mr. DiCaprio
i. Posted for Ballot. Closes on September 4th.
ii. Mr. Moleski will review the appropriate Compliance Bulletin for accuracy and will report back to the RSCS at their next meeting

3. FERC Activities:
Mr. DiCaprio led a discussion on recent FERC activities:

No significant FERC activities to report.

4. NERC Activities:
Administrative:

No significant NERC committee updates to report.

Standards under development:

1) Project 2010-17: Definition of Bulk Electric System (Phase 2) (Mr. Harm)
i. New posting is out with a September 4th due date. 2 significant changes to the previous posting.
   a. Previously, the Drafting Team tried to combine distributed generation with traditional generation. These two groups were segregated in the new version.
   b. Previously, sub-100kV “loops” could be considered to be BES. Now, specific analysis needs to be performed, and they need to be submitted into the exception process, but they are not automatically considered to be BES.
   ii. Webinar scheduled for August 21st, 2013

2) Project 2013-03: Geomagnetic Disturbance Mitigation (EOP-010-1) (Ms. Mons)
i. The 45-day formal comment period closed Monday, August 12, 2013. PJM voted in the affirmative, but did submit comments.
   1. Concern with redundancy to IRO-005
   iii. Frank Koza is the Chair of the SDT.
   iv. Ms. Monzon agreed to come back to the Subcommittee in the future with PJM’s plan to address the Standard.

3) Project 2010-13.2 – Phase 2 of Relay Loadibility: (Ms. Monzon)
ii. PRC-025-1 Balloted and passed.

4) Project 2007-17.2: Protection System Maintenance and Testing – Phase 2, Reclosing Relays
   i. Draft 2 of PRC-005-3 is posted for formal comments through August 23, 2013.
   ii. Generally, generator owners saw no impact to their equipment or processes, and will likely vote in the affirmative.
   iii. PJM is not an applicable entity, and will likely abstain.

5) Project 2008-12: Coordination Interchange Standards
   i. Proposes retirement of INT-001, INT-005, INT-007, and INT-008.
   iii. PJM supports covering these items as NAESB business practices instead of reliability standards.

6) Project 2012-05: ATC Revisions – MOD A
   i. combines and updates current MOD-001 (ATC) + 004 (CBM) + 008 (TRM) + 028 (ATC) + 029 (Rated System Path Method) + 030 (Flowgate Method)
   ii. PJM likely will support covering these items as NAESB business practices instead of reliability standards, but a formal position has not yet been developed.

7) Project 2010-01: Training
   i. The standard has the potential to result in subjective inclusion by auditors of people not generally considered as part of operations. (Planning and other support personnel)
   ii. The definitions in PER-005 relate to people not to Functional entities. (e.g. System Operator, System Personnel, Support Personnel). Bad precedent.
   iii. A ballot pool is being formed and the ballot pool window is open through 8 a.m. Eastern on Monday, August 19, 2013.

8) Project 2013-04: Voltage and Reactive Control
   i. The proposed VAR-001 requires TOPs to have policies and procedures re voltage levels and Reactive power flows.
   ii. Some concern that this is a fill-in-the-blank standard which in effect supports different voltage, limits and margins for each TOP.
   iii. The proposed VAR-002 provides guidance on a non-compliance window in the event a unit is deviating from schedule.
      1. Extended debate within the Subcommittee on the timeframe of the “window”. One hour in early versions shrank to 30 minutes, shrank again to 15. (no valid reason given under direct questioning)
   iv. PJM will likely support.

9) Project 2010-03: Modeling Data – MOD B
   i. 45-day formal comment period for MOD-032-1 and MOD-033-1 through 8 p.m. Eastern on Wednesday, September 4, 2013.
   ii. The standard authorization request (SAR) for this project is also posted for comment.
   iii. No position yet from the SRC, but they are developing comments.

10) Project 2010-04: Modeling Data – MOD C
    i. New MOD-031-1 combines and updates current MOD-016, MOD-017, MOD-018, MOD-019, and MOD-021
ii. This activity belongs under Rules of Procedure and does rise to the level of a mandatory enforceable standard.

iii. 45-day formal comment period for MOD-031-1 through 8 p.m. Eastern on Wednesday, September 4, 2013.

iv. The standard authorization request (SAR) for this project is also posted for comment.

11) Project 2012-13 NUC Five Year Review
i. The SAR and redlined standard were posted only to solicit informational feedback from industry on whether each is an effective and reasonable implementation of the Five-Year Review Team’s (FYRT) recommendation to revise NUC-001-2. Any changes will still occur through the formal standards development process.

ii. The proposed NUC-001 set of changes are mostly grammatical

iii. It is likely PJM will support.

12) Project 2010-02: FAC Five Year Review
i. The FAC FYRT deleted much of the detail in the current requirements of FAC-001.

ii. FAC-002 deals with Interconnecting new facilities and the related plans for interconnection. The FAC FYRT proposal is to break up requirements for clarity.

iii. Requirements use verbs “coordinate and cooperate” which seem to be subjective at best.

iv. The FAC FYRT has not changed FAC-003, FAC-008 or FAC-013.

v. The FAC FYRT proposed to delay FAC-010, FAC-011 and FAC-014 until TOP standards are ruled on by FERC

13) Project 2010-14.1: Phase 1 of Balancing Authority Reliability-based Controls: Reserves
i. BAL-002-2 Contingency Reserve for Recovery from a Balancing Contingency Event is posted for a 45-day comment period through September 16, 2013.

ii. R2 now proposed that performance be measured on each individual event, rather than a quarterly average of all events. There is no reasoning provided for the added complexity. The SAR does not discuss changing the measurement approach.

14) Project 2009-03: EOP Five Year Review
i. The EOP-001-2.1b requires the TOP & BA to have emergency operations plans.

ii. The EOP FYRT recommends retiring Requirements R3.1 (re COM), R6.1 (COM) R6.3 (Fuel plans) R3.2 (Listing) R3.4 , R6.2 (interchange involvement), R6.4 (fuel delivery involvement) per Paragraph 81.

iii. The EOP FYRT recommends revising and merging EOP-001-2.b and EOP-002-3.1 into one standard; revising Requirements R1, R2 and R5. A review of Attachment 1 was also recommended by this team.

iv. EOP-002-3.1 (Capacity and Energy Emergencies) The EOP FYRT recommends retiring Requirements R1 (re responsibility & authority) and R6 (DCS & CPS actions) and R9 (transmission priority) per Paragraph 81.

v. EOP-003-2 (Load Shedding) The EOP FYRT recommends retiring Requirements R5 and R6 per Paragraph 81. Requirements R2, R4 and R7 are recommended to be moved to PRC-010-0.

15) Project 2012-09: IRO Five Year Review
i. The IRO-003-2 (Forecasting IROLs) The IRO FYRT Recommends cleaning up requirements for clarity
ii. IRO-004-2 (Operations Planning) The IRO FYRT recommends retirement of some requirements, but also recommends TSP get moved to IRO-001. TSP is a Market entity more than a reliability entity involved in IROLs

iii. IRO-005-4 (Current Day Ops) re RC informing entities of IROLs – The IRO FYRT recommend revising and rearranging

iv. IRO-006-EAST (TLR) The IRO FYRT recommends retiring some requirements as being redundant

v. IRO-008-1 (RC Operational Analyses) The IRO FYRT recommends retiring some requirements as being redundant

vi. IRO-009-1 (RC Actions) recommends removal of some terms. “Without delay” is not defined but was meant to require immediate action as opposed to waiting. Current language is strong enough and shows IROLs won’t be tolerated.

vii. IRO-010-1a (Data Spec) was envisioned as the defining mandate to get data. The IRO FYRT recommendation is to add DP and PC to applicability.

5. Regional Entities Activities:
Ms. Monzon reported that there were no new Regional Entity activities to report.

6. Member Issues:
There were no member issues to discuss

7. Future Meeting Dates:

2013 RSCS Meeting Dates:
Friday September 20th, 2013 – WebEx
Friday October 18th, 2013 – WebEx
Thursday November 21st, 2013 – Face to Face
Friday December 20th, 2013 – WebEx

2014 RSCS Meeting Dates:
Friday January 17th, 2014 – WebEx
Thursday February 20th, 2014 – F2F
Friday March 21st, 2014 – WebEx
Friday April 18th 2014 – WebEx
Thursday May 15th, 2014 – F2F
Friday June 20th, 2014 – WebEx
Friday July 18th, 2014 – WebEx
Thursday August 14th, 2014 – F2F
Friday September 19th, 2014 – WebEx
Friday October 17th, 2014 – WebEx
Thursday November 20th, 2014 – F2F
Friday December 19th, 2014 – WebEx

RSCS Schedule:

Monthly WebEx: Third Friday of every month, except months where a quarterly Face-to-Face meeting is scheduled.

9. Adjourn:
Mr. Moleski adjourned the meeting at 12:41.