

November 7, 2016

VIA ELECTRONIC FILING

Ms. Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, D.C. 20426

RE: Revisions to the Violation Risk Factors for Reliability Standards IRO-018-1 and TOP-010-1, Docket No. RD16-6-000

Dear Secretary Bose:

In accordance with the order issued by the Federal Energy Regulatory Commission (“Commission”) on September 22, 2016 in the above-captioned docket,¹ and Section 320 of the North American Electric Reliability Corporation (“NERC”)² Rules of Procedure,³ NERC submits proposed revisions to the Violation Risk Factors (“VRFs”) for Requirement R1 of Reliability Standard IRO-018-1 (*Reliability Coordinator Real-time Reliability Monitoring and Analysis Capabilities*) and Requirements R1 and R2 of Reliability Standard TOP-010-1 (*Real-time Reliability Monitoring and Analysis Capabilities*). The revisions are attached hereto as Exhibit A.

On November 2, 2016, the NERC Board of Trustees approved the revised VRFs and authorized their submission to the Commission. NERC respectfully requests that the Commission approve the revised VRF designations as just, reasonable, not unduly discriminatory or preferential, in the public interest, and consistent with the Commission’s directive in the September 22 Order.

¹ *Order Approving Reliability Standards*, 156 FERC ¶ 61,207 (2016) (“September 22 Order”).

² The Commission certified NERC as the electric reliability organization (“ERO”) in accordance with Section 215 of the Federal Power Act on July 20, 2006. *N. Am. Elec. Reliability Corp.*, 116 FERC ¶ 61,062 (2006).

³ NERC Rules of Procedure, Section 320, Procedure for Developing and Approving Violation Risk Factors and Violation Severity Levels, *available at* <http://www.nerc.com/AboutNERC/Pages/Rules-of-Procedure.aspx>.

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I. Background

As initially proposed, Reliability Standards IRO-018-1 and TOP-010-1 reflected “medium” VRF designations for all requirements. Support for these VRF designations was included in Section IV.D and Exhibit D of NERC’s petition seeking approval of these Reliability Standards.⁴

In the September 22 Order, the Commission approved the Reliability Standards and the associated implementation plan, Violation Severity Levels, and several of the proposed VRFs. The Commission directed NERC to submit a compliance filing, within 60 days of the issuance of the September 22 Order, to revise the VRF designations for Requirement R1 of Reliability Standard IRO-018-1 and Requirements R1 and R2 of Reliability Standard TOP-010-1 from “medium” to “high”.

II. Proposed VRF Revisions

Upon issuance of the September 22 Order, NERC reviewed the VRFs for Reliability Standards IRO-018-1 and TOP-010-1 pursuant to Section 320 of the NERC Rules of Procedure. The NERC director of standards recommended that the NERC Board of Trustees approve the Commission-directed revisions to the VRFs for these standards. On November 2, 2016, the NERC Board of Trustees approved submission of the revised VRFs (as Reliability Standards IRO-018-1(i) and TOP-010-1(i)), reflected in Exhibit A.

III. Conclusion

For the foregoing reasons, NERC respectfully requests that the Commission accept this filing and approve the proposed VRF revisions as just, reasonable, not unduly discriminatory or preferential, in the public interest, and compliant with the September 22 Order.

Respectfully submitted,

/s/ Lauren A. Perotti

Lauren A. Perotti
Counsel for North American Electric
Reliability Corporation

cc: Official service list in Docket No. RD16-6-000

⁴ *Petition of NERC for Approval of Proposed Reliability Standards IRO-018-1 and TOP-010-1*, Docket No. RD16-6-000, at Section IV.D and Exhibit D (filed May 26, 2016).

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing document upon all parties listed on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, D.C. this 7th day of November, 2016.

/s/ Lauren A. Perotti

Lauren A. Perotti
*Counsel for North American
Electric Reliability Corporation*

EXHIBIT A

Reliability Standard IRO-018-1(i)

Clean and Redline

Reliability Standard IRO-018-1(i)

Clean Version

A. Introduction

1. **Title:** Reliability Coordinator Real-time Reliability Monitoring and Analysis Capabilities
2. **Number:** IRO-018-1(i)
3. **Purpose:** Establish requirements for Real-time monitoring and analysis capabilities to support reliable System operations.
4. **Applicability:**
 - 4.1. **Functional Entities:**
 - 4.1.1. Reliability Coordinators
5. **Effective Date:** See Implementation Plan

B. Requirements and Measures

- R1.** Each Reliability Coordinator shall implement an Operating Process or Operating Procedure to address the quality of the Real-time data necessary to perform its Real-time monitoring and Real-time Assessments. The Operating Process or Operating Procedure shall include: *[Violation Risk Factor: High] [Time Horizon: Real-time Operations]*
 - 1.1. Criteria for evaluating the quality of Real-time data;
 - 1.2. Provisions to indicate the quality of Real-time data to the System Operator; and
 - 1.3. Actions to address Real-time data quality issues with the entity(ies) responsible for providing the data when data quality affects Real-time Assessments.
- M1.** Each Reliability Coordinator shall have evidence it implemented its Operating Process or Operating Procedure to address the quality of the Real-time data necessary to perform its Real-time monitoring and Real-time Assessments. This evidence could include, but is not limited to: 1) an Operating Process or Operating Procedure in electronic or hard copy format meeting all provisions of Requirement R1; and 2) evidence the Reliability Coordinator implemented the Operating Process or Operating Procedure as called for in the Operating Process or Operating Procedure, such as dated operator or supporting logs, dated checklists, voice recordings, voice transcripts, or other evidence.
- R2.** Each Reliability Coordinator shall implement an Operating Process or Operating Procedure to address the quality of analysis used in its Real-time Assessments. The Operating Process or Operating Procedure shall include: *[Violation Risk Factor: Medium] [Time Horizon: Real-time Operations]*
 - 2.1. Criteria for evaluating the quality of analysis used in its Real-time Assessments;
 - 2.2. Provisions to indicate the quality of analysis used in its Real-time Assessments; and

- 2.3.** Actions to address analysis quality issues affecting its Real-time Assessments.
- M2.** Each Reliability Coordinator shall have evidence it implemented its Operating Process or Operating Procedure to address the quality of analysis used in its Real-time Assessments as specified in Requirement R2. This evidence could include, but is not limited to: 1) an Operating Process or Operating Procedure in electronic or hard copy format meeting all provisions of Requirement R2; and 2) evidence the Reliability Coordinator implemented the Operating Process or Operating Procedure as called for in the Operating Process or Operating Procedure, such as dated operator logs, dated checklists, voice recordings, voice transcripts, or other evidence.
- R3.** Each Reliability Coordinator shall have an alarm process monitor that provides notification(s) to its System Operators when a failure of its Real-time monitoring alarm processor has occurred. *[Violation Risk Factor: Medium] [Time Horizon: Real-time Operations]*
- M3.** Each Reliability Coordinator shall have evidence of an alarm process monitor that provides notification(s) to its System Operators when a failure of its Real-time monitoring alarm processor has occurred. This evidence could include, but is not limited to, operator logs, computer printouts, system specifications, or other evidence.

C. Compliance

1. Compliance Monitoring Process

1.1. Compliance Enforcement Authority:

“Compliance Enforcement Authority” means NERC or the Regional Entity, or any entity as otherwise designated by an Applicable Governmental Authority, in their respective roles of monitoring and/or enforcing compliance with mandatory and enforceable Reliability Standards in their respective jurisdictions.

1.2. Evidence Retention:

The following evidence retention period(s) identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show it was compliant for the full-time period since the last audit.

The Reliability Coordinator shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

The Reliability Coordinator shall retain evidence of compliance for Requirements R1 and R3 and Measures M1 and M3 for the current calendar year and one previous calendar year, with the exception of operator logs and

voice recordings which shall be retained for a minimum of 90 calendar days, unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

The Reliability Coordinator shall retain evidence of compliance for Requirement R2 and Measure M2 for a rolling 30-day period, unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

If a Reliability Coordinator is found non-compliant it shall keep information related to the non-compliance until mitigation is complete and approved or for the time specified above, whichever is longer.

The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records.

1.3. Compliance Monitoring and Enforcement Program

As defined in the NERC Rules of Procedure, “Compliance Monitoring and Enforcement Program” refers to the identification of the processes used to evaluate data or information for the purpose of assessing performance or outcomes with the associated Reliability Standard.

Violation Severity Levels

| R # | Violation Severity Levels | | | |
|-----|---------------------------|--|--|---|
| | Lower VSL | Moderate VSL | High VSL | Severe VSL |
| R1. | N/A | The Reliability Coordinator's Operating Process or Operating Procedure to address the quality of the Real-time data necessary to perform its Real-time monitoring and Real-time Assessments did not include one of the elements listed in Part 1.1 through Part 1.3. | The Reliability Coordinator's Operating Process or Operating Procedure to address the quality of the Real-time data necessary to perform its Real-time monitoring and Real-time Assessments did not include two of the elements listed in Part 1.1 through Part 1.3. | The Reliability Coordinator's Operating Process or Operating Procedure to address the quality of the Real-time data necessary to perform its Real-time monitoring and Real-time Assessments did not include any of the elements listed in Part 1.1 through Part 1.3; OR The Reliability Coordinator did not implement an Operating Process or Operating Procedure to address the quality of the Real-time data necessary to perform its Real-time monitoring and Real-time Assessments. |
| R2. | N/A | The Reliability Coordinator's Operating Process or Operating Procedure to address the quality of | The Reliability Coordinator's Operating Process or Operating Procedure to address the quality of | The Reliability Coordinator's Operating Process or Operating Procedure to address the quality of |

| | | | | |
|------------|-----|---|---|--|
| | | analysis used in its Real-time Assessments did not include one of the elements listed in Part 2.1 through Part 2.3. | analysis used in its Real-time Assessments did not include two of the elements listed in Part 2.1 through Part 2.3. | analysis used in its Real-time Assessments did not include any of the elements listed in Part 2.1 through Part 2.3; OR The Reliability Coordinator did not implement an Operating Process or Operating Procedure to address the quality of analysis used in its Real-time Assessments. |
| R3. | N/A | N/A | The Reliability Coordinator has an alarm process monitor but the alarm process monitor did not provide a notification(s) to its System Operators when a failure of its Real-time monitoring alarm processor occurred. | The Reliability Coordinator does not have an alarm process monitor that provides notification(s) to its System Operators when a failure of its Real-time monitoring alarm processor has occurred. |

D. Regional Variances

None.

E. Associated Documents

- [Implementation Plan](#)

Version History

| Version | Date | Action | Change Tracking |
|---------|--------------------|--|-----------------|
| 1 | October 30, 2015 | New standard developed in Project 2009-02 to respond to recommendations in Real-time Best Practices Task Force Report and FERC directives. | N/A |
| 1 | May 5, 2016 | Adopted by the Board of Trustees. | New |
| 1 | September 22, 2016 | FERC Order issued approving IRO-018-1. Docket No. RD16-6-000 | |
| 1(i) | September 22, 2016 | FERC directive to change Requirement 1 from 'medium' to 'high'. Docket No. RD16-6-000 | Revised |
| 1(i) | November 2, 2016 | Adopted by the Board of Trustees | New |

Guidelines and Technical Basis

Real-time monitoring, or *monitoring* the Bulk Electric System (BES) in Real-time, is a primary function of Reliability Coordinators (RCs), Transmission Operators (TOPs), and Balancing Authorities (BAs) as required by TOP and IRO Reliability Standards. As used in TOP and IRO Reliability Standards, monitoring involves observing operating status and operating values in Real-time for awareness of system conditions. Real-time monitoring may include the following activities performed in Real-time:

- Acquisition of operating data;
- Display of operating data as needed for visualization of system conditions;
- Audible or visual alerting when warranted by system conditions; and
- Audible or visual alerting when monitoring and analysis capabilities degrade or become unavailable.

Requirement R1

The RC uses a set of Real-time data identified in IRO-010-1a Requirement R1 and IRO-010-2 Requirement R1 to perform its Real-time monitoring and Real-time Assessments. Requirements to perform monitoring and Real-time Assessments appear in other Reliability Standards.

The RC's Operating Process or Operating Procedure must contain criteria for evaluating the quality of Real-time data as specified in proposed IRO-018-1 Requirement R1 Part 1.1. The criteria support identification of applicable data quality issues, which may include:

- Data outside of a prescribed data range;
- Analog data not updated within a predetermined time period;
- Data entered manually to override telemetered information; or
- Data otherwise identified as invalid or suspect.

The Operating Process or Operating Procedure must include provisions for indicating the quality of Real-time data to operating personnel. Descriptions of quality indicators such as display color codes, data quality flags, or other such indicators as found in Real-time monitoring specifications could be used.

Requirement R1 Part 1.3 specifies the RC shall include actions to address Real-time data quality issues with the entity(ies) responsible for providing the data when data quality affects Real-time Assessments. Requirement R1 Part 1.3 is focused on addressing data point quality issues affecting Real-time Assessments. Other data quality issues of a lower priority are addressed according to an entity's operating practices and are not covered under Requirement R1 Part 1.3.

The RC's actions to address data quality issues are steps within existing authorities and capabilities that provide awareness and enable the RC to meet its obligations for performing the Real-time Assessment. Examples of actions to address data quality issues include, but are not limited to, the following:

- Notifying entities that provide Real-time data to the RC;

Supplemental Material

- Following processes established for resolving data conflicts as specified in IRO-010-1a, IRO-010-2, or other applicable Reliability Standards;
- Taking corrective actions on the RC's own data;
- Changing data sources or other inputs so that the data quality issue no longer affects the RC's Real-time Assessment; and
- Inputting data manually and updating as necessary.

The Operating Process or Operating Procedure must clearly identify to operating personnel how to determine the data that affects the quality of the Real-time Assessment so that effective actions can be taken to address data quality issues in an appropriate timeframe.

Requirement R2

Requirement R2 ensures RCs have procedures to address issues related to the quality of the analysis results used for Real-time Assessments. Requirements to perform Real-time Assessments appear in other Reliability Standards. Examples of the types of analysis used in Real-time Assessments include, as applicable, state estimation, Real-time Contingency analysis, Stability analysis or other studies used for Real-time Assessments.

Examples of the types of criteria used to evaluate the quality of analysis used in Real-time Assessments may include solution tolerances, mismatches with Real-time data, convergences, etc.

The Operating Process or Operating Procedure must describe how the quality of analysis results used in Real-time Assessment will be shown to operating personnel.

Requirement R3

Requirement R3 addresses recommendation S7 of the Real-time Best Practices Task Force report concerning operator awareness of alarm availability.

An alarm process monitor could be an application within a Real-time monitoring system or it could be a separate system. 'Heartbeat' or 'watchdog' monitors are examples of an alarm process monitor. An alarm process monitor should be designed and implemented such that a stall of the Real-time monitoring alarm processor does not cause a failure of the alarm process monitor.

Rationale

Rationale for Requirement R1: The Reliability Coordinator (RC) uses a set of Real-time data identified in IRO-010-1a Requirement R1 and IRO-010-2 Requirement R1 to perform its Real-time monitoring and Real-time Assessments. Requirements to perform Real-time monitoring and Real-time Assessments appear in other Reliability Standards.

The Operating Process or Operating Procedure must include provisions for indicating the quality of Real-time data to operating personnel. Descriptions of quality indicators such as display color codes, data quality flags, or other such indicators as found in Real-time monitoring specifications could be used.

Requirement R1 Part 1.3 of this standard specifies the RC shall include actions to address Real-time data quality issues affecting its Real-time Assessments in its Operating Process or Operating Procedure. Examples of actions to address Real-time data quality issues are provided in the Guidelines and Technical Basis section. These actions could be the same as the process used to resolve data conflicts required by IRO-010-2 Requirement R3 Part 3.2 provided that this process addresses Real-time data quality issues.

The revision in Part 1.3 to address Real-time data quality issues *when data quality affects Real-time Assessments* clarifies the scope of data points that must be covered by the Operating Process or Operating Procedure.

Rationale for Requirement R2: Requirement R2 ensures RCs have procedures to address issues related to the quality of the analysis results used for Real-time Assessments. Requirements to perform Real-time Assessments appear in other Reliability Standards. Examples of the types of analysis used in Real-time Assessments include, as applicable, state estimation, Real-time Contingency analysis, Stability analysis or other studies used for Real-time Assessments.

The Operating Process or Operating Procedure must include provisions for how the quality of analysis results used in Real-time Assessment will be shown to operating personnel. Operating personnel includes System Operators and staff responsible for supporting Real-time operations.

Rationale for Requirement R3: The requirement addresses recommendation S7 of the Real-time Best Practices Task Force report concerning operator awareness of alarm availability.

The requirement in Draft Two of the proposed standard has been revised for clarity by removing the term *independent*. The alarm process monitor must be able to provide notification of failure of the Real-time monitoring alarm processor. This capability could be provided by an application within a Real-time monitoring system or by a separate component used by the System Operator. The alarm process monitor must not fail with a simultaneous failure of the Real-time monitoring alarm processor.

Reliability Standard IRO-018-1(i)

Redline Version

A. Introduction

1. **Title:** Reliability Coordinator Real-time Reliability Monitoring and Analysis Capabilities
2. **Number:** IRO-018-1(i)
3. **Purpose:** Establish requirements for Real-time monitoring and analysis capabilities to support reliable System operations.
4. **Applicability:**
 - 4.1. **Functional Entities:**
 - 4.1.1. Reliability Coordinators
5. **Effective Date:** See Implementation Plan

B. Requirements and Measures

- R1. Each Reliability Coordinator shall implement an Operating Process or Operating Procedure to address the quality of the Real-time data necessary to perform its Real-time monitoring and Real-time Assessments. The Operating Process or Operating Procedure shall include: *[Violation Risk Factor: ~~Medium~~High] [Time Horizon: Real-time Operations]*
 - 1.1. Criteria for evaluating the quality of Real-time data;
 - 1.2. Provisions to indicate the quality of Real-time data to the System Operator; and
 - 1.3. Actions to address Real-time data quality issues with the entity(ies) responsible for providing the data when data quality affects Real-time Assessments.
- M1. Each Reliability Coordinator shall have evidence it implemented its Operating Process or Operating Procedure to address the quality of the Real-time data necessary to perform its Real-time monitoring and Real-time Assessments. This evidence could include, but is not limited to: 1) an Operating Process or Operating Procedure in electronic or hard copy format meeting all provisions of Requirement R1; and 2) evidence the Reliability Coordinator implemented the Operating Process or Operating Procedure as called for in the Operating Process or Operating Procedure, such as dated operator or supporting logs, dated checklists, voice recordings, voice transcripts, or other evidence.
- R2. Each Reliability Coordinator shall implement an Operating Process or Operating Procedure to address the quality of analysis used in its Real-time Assessments. The Operating Process or Operating Procedure shall include: *[Violation Risk Factor: Medium] [Time Horizon: Real-time Operations]*
 - 2.1. Criteria for evaluating the quality of analysis used in its Real-time Assessments;
 - 2.2. Provisions to indicate the quality of analysis used in its Real-time Assessments; and

- 2.3.** Actions to address analysis quality issues affecting its Real-time Assessments.
- M2.** Each Reliability Coordinator shall have evidence it implemented its Operating Process or Operating Procedure to address the quality of analysis used in its Real-time Assessments as specified in Requirement R2. This evidence could include, but is not limited to: 1) an Operating Process or Operating Procedure in electronic or hard copy format meeting all provisions of Requirement R2; and 2) evidence the Reliability Coordinator implemented the Operating Process or Operating Procedure as called for in the Operating Process or Operating Procedure, such as dated operator logs, dated checklists, voice recordings, voice transcripts, or other evidence.
- R3.** Each Reliability Coordinator shall have an alarm process monitor that provides notification(s) to its System Operators when a failure of its Real-time monitoring alarm processor has occurred. *[Violation Risk Factor: Medium] [Time Horizon: Real-time Operations]*
- M3.** Each Reliability Coordinator shall have evidence of an alarm process monitor that provides notification(s) to its System Operators when a failure of its Real-time monitoring alarm processor has occurred. This evidence could include, but is not limited to, operator logs, computer printouts, system specifications, or other evidence.

C. Compliance

1. Compliance Monitoring Process

1.1. Compliance Enforcement Authority:

“Compliance Enforcement Authority” means NERC or the Regional Entity, or any entity as otherwise designated by an Applicable Governmental Authority, in their respective roles of monitoring and/or enforcing compliance with mandatory and enforceable Reliability Standards in their respective jurisdictions.

1.2. Evidence Retention:

The following evidence retention period(s) identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show it was compliant for the full-time period since the last audit.

The Reliability Coordinator shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

The Reliability Coordinator shall retain evidence of compliance for Requirements R1 and R3 and Measures M1 and M3 for the current calendar year and one previous calendar year, with the exception of operator logs and

voice recordings which shall be retained for a minimum of 90 calendar days, unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

The Reliability Coordinator shall retain evidence of compliance for Requirement R2 and Measure M2 for a rolling 30-day period, unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

If a Reliability Coordinator is found non-compliant it shall keep information related to the non-compliance until mitigation is complete and approved or for the time specified above, whichever is longer.

The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records.

1.3. Compliance Monitoring and Enforcement Program

As defined in the NERC Rules of Procedure, “Compliance Monitoring and Enforcement Program” refers to the identification of the processes used to evaluate data or information for the purpose of assessing performance or outcomes with the associated Reliability Standard.

Violation Severity Levels

| R # | Violation Severity Levels | | | |
|------------|---------------------------|--|--|---|
| | Lower VSL | Moderate VSL | High VSL | Severe VSL |
| R1. | N/A | The Reliability Coordinator's Operating Process or Operating Procedure to address the quality of the Real-time data necessary to perform its Real-time monitoring and Real-time Assessments did not include one of the elements listed in Part 1.1 through Part 1.3. | The Reliability Coordinator's Operating Process or Operating Procedure to address the quality of the Real-time data necessary to perform its Real-time monitoring and Real-time Assessments did not include two of the elements listed in Part 1.1 through Part 1.3. | The Reliability Coordinator's Operating Process or Operating Procedure to address the quality of the Real-time data necessary to perform its Real-time monitoring and Real-time Assessments did not include any of the elements listed in Part 1.1 through Part 1.3; OR The Reliability Coordinator did not implement an Operating Process or Operating Procedure to address the quality of the Real-time data necessary to perform its Real-time monitoring and Real-time Assessments. |
| R2. | N/A | The Reliability Coordinator's Operating Process or Operating Procedure to address the quality of | The Reliability Coordinator's Operating Process or Operating Procedure to address the quality of | The Reliability Coordinator's Operating Process or Operating Procedure to address the quality of |

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|------------|-----|---|---|--|
| | | analysis used in its Real-time Assessments did not include one of the elements listed in Part 2.1 through Part 2.3. | analysis used in its Real-time Assessments did not include two of the elements listed in Part 2.1 through Part 2.3. | analysis used in its Real-time Assessments did not include any of the elements listed in Part 2.1 through Part 2.3; OR The Reliability Coordinator did not implement an Operating Process or Operating Procedure to address the quality of analysis used in its Real-time Assessments. |
| R3. | N/A | N/A | The Reliability Coordinator has an alarm process monitor but the alarm process monitor did not provide a notification(s) to its System Operators when a failure of its Real-time monitoring alarm processor occurred. | The Reliability Coordinator does not have an alarm process monitor that provides notification(s) to its System Operators when a failure of its Real-time monitoring alarm processor has occurred. |

D. Regional Variances

None.

E. Associated Documents

- [Implementation Plan](#)

Version History

| Version | Date | Action | Change Tracking |
|-------------|---------------------------|--|-----------------|
| 1 | October 30, 2015 | New standard developed in Project 2009-02 to respond to recommendations in Real-time Best Practices Task Force Report and FERC directives. | N/A |
| 1 | May 5, 2016 | Adopted by the Board of Trustees. | New |
| <u>1</u> | <u>September 22, 2016</u> | <u>FERC Order issued approving IRO-018-1. Docket No. RD16-6-000</u> | |
| <u>1(i)</u> | <u>September 22, 2016</u> | <u>FERC directive to change Requirement 1 from 'medium' to 'high'. Docket No. RD16-6-000</u> | <u>Revised</u> |
| <u>1(i)</u> | <u>November 2, 2016</u> | <u>Adopted by the Board of Trustees</u> | <u>New</u> |

Guidelines and Technical Basis

Real-time monitoring, or *monitoring* the Bulk Electric System (BES) in Real-time, is a primary function of Reliability Coordinators (RCs), Transmission Operators (TOPs), and Balancing Authorities (BAs) as required by TOP and IRO Reliability Standards. As used in TOP and IRO Reliability Standards, monitoring involves observing operating status and operating values in Real-time for awareness of system conditions. Real-time monitoring may include the following activities performed in Real-time:

- Acquisition of operating data;
- Display of operating data as needed for visualization of system conditions;
- Audible or visual alerting when warranted by system conditions; and
- Audible or visual alerting when monitoring and analysis capabilities degrade or become unavailable.

Requirement R1

The RC uses a set of Real-time data identified in IRO-010-1a Requirement R1 and IRO-010-2 Requirement R1 to perform its Real-time monitoring and Real-time Assessments. Requirements to perform monitoring and Real-time Assessments appear in other Reliability Standards.

The RC's Operating Process or Operating Procedure must contain criteria for evaluating the quality of Real-time data as specified in proposed IRO-018-1 Requirement R1 Part 1.1. The criteria support identification of applicable data quality issues, which may include:

- Data outside of a prescribed data range;
- Analog data not updated within a predetermined time period;
- Data entered manually to override telemetered information; or
- Data otherwise identified as invalid or suspect.

The Operating Process or Operating Procedure must include provisions for indicating the quality of Real-time data to operating personnel. Descriptions of quality indicators such as display color codes, data quality flags, or other such indicators as found in Real-time monitoring specifications could be used.

Requirement R1 Part 1.3 specifies the RC shall include actions to address Real-time data quality issues with the entity(ies) responsible for providing the data when data quality affects Real-time Assessments. Requirement R1 Part 1.3 is focused on addressing data point quality issues affecting Real-time Assessments. Other data quality issues of a lower priority are addressed according to an entity's operating practices and are not covered under Requirement R1 Part 1.3.

The RC's actions to address data quality issues are steps within existing authorities and capabilities that provide awareness and enable the RC to meet its obligations for performing the Real-time Assessment. Examples of actions to address data quality issues include, but are not limited to, the following:

- Notifying entities that provide Real-time data to the RC;

Supplemental Material

- Following processes established for resolving data conflicts as specified in IRO-010-1a, IRO-010-2, or other applicable Reliability Standards;
- Taking corrective actions on the RC's own data;
- Changing data sources or other inputs so that the data quality issue no longer affects the RC's Real-time Assessment; and
- Inputting data manually and updating as necessary.

The Operating Process or Operating Procedure must clearly identify to operating personnel how to determine the data that affects the quality of the Real-time Assessment so that effective actions can be taken to address data quality issues in an appropriate timeframe.

Requirement R2

Requirement R2 ensures RCs have procedures to address issues related to the quality of the analysis results used for Real-time Assessments. Requirements to perform Real-time Assessments appear in other Reliability Standards. Examples of the types of analysis used in Real-time Assessments include, as applicable, state estimation, Real-time Contingency analysis, Stability analysis or other studies used for Real-time Assessments.

Examples of the types of criteria used to evaluate the quality of analysis used in Real-time Assessments may include solution tolerances, mismatches with Real-time data, convergences, etc.

The Operating Process or Operating Procedure must describe how the quality of analysis results used in Real-time Assessment will be shown to operating personnel.

Requirement R3

Requirement R3 addresses recommendation S7 of the Real-time Best Practices Task Force report concerning operator awareness of alarm availability.

An alarm process monitor could be an application within a Real-time monitoring system or it could be a separate system. 'Heartbeat' or 'watchdog' monitors are examples of an alarm process monitor. An alarm process monitor should be designed and implemented such that a stall of the Real-time monitoring alarm processor does not cause a failure of the alarm process monitor.

Rationale

Rationale for Requirement R1: The Reliability Coordinator (RC) uses a set of Real-time data identified in IRO-010-1a Requirement R1 and IRO-010-2 Requirement R1 to perform its Real-time monitoring and Real-time Assessments. Requirements to perform Real-time monitoring and Real-time Assessments appear in other Reliability Standards.

The Operating Process or Operating Procedure must include provisions for indicating the quality of Real-time data to operating personnel. Descriptions of quality indicators such as display color codes, data quality flags, or other such indicators as found in Real-time monitoring specifications could be used.

Requirement R1 Part 1.3 of this standard specifies the RC shall include actions to address Real-time data quality issues affecting its Real-time Assessments in its Operating Process or Operating Procedure. Examples of actions to address Real-time data quality issues are provided in the Guidelines and Technical Basis section. These actions could be the same as the process used to resolve data conflicts required by IRO-010-2 Requirement R3 Part 3.2 provided that this process addresses Real-time data quality issues.

The revision in Part 1.3 to address Real-time data quality issues *when data quality affects Real-time Assessments* clarifies the scope of data points that must be covered by the Operating Process or Operating Procedure.

Rationale for Requirement R2: Requirement R2 ensures RCs have procedures to address issues related to the quality of the analysis results used for Real-time Assessments. Requirements to perform Real-time Assessments appear in other Reliability Standards. Examples of the types of analysis used in Real-time Assessments include, as applicable, state estimation, Real-time Contingency analysis, Stability analysis or other studies used for Real-time Assessments.

The Operating Process or Operating Procedure must include provisions for how the quality of analysis results used in Real-time Assessment will be shown to operating personnel. Operating personnel includes System Operators and staff responsible for supporting Real-time operations.

Rationale for Requirement R3: The requirement addresses recommendation S7 of the Real-time Best Practices Task Force report concerning operator awareness of alarm availability.

The requirement in Draft Two of the proposed standard has been revised for clarity by removing the term *independent*. The alarm process monitor must be able to provide notification of failure of the Real-time monitoring alarm processor. This capability could be provided by an application within a Real-time monitoring system or by a separate component used by the System Operator. The alarm process monitor must not fail with a simultaneous failure of the Real-time monitoring alarm processor.

Reliability Standard TOP-010-1(i)

Clean and Redline

Reliability Standard TOP-010-1(i)

Clean Version

A. Introduction

1. **Title:** Real-time Reliability Monitoring and Analysis Capabilities
2. **Number:** TOP-010-1(i)
3. **Purpose:** Establish requirements for Real-time monitoring and analysis capabilities to support reliable System operations.
4. **Applicability:**
 - 4.1. **Functional Entities:**
 - 4.1.1. Transmission Operators
 - 4.1.2. Balancing Authorities
5. **Effective Date:** See Implementation Plan

B. Requirements and Measures

- R1.** Each Transmission Operator shall implement an Operating Process or Operating Procedure to address the quality of the Real-time data necessary to perform its Real-time monitoring and Real-time Assessments. The Operating Process or Operating Procedure shall include: *[Violation Risk Factor: High] [Time Horizon: Real-time Operations]*
 - 1.1. Criteria for evaluating the quality of Real-time data;
 - 1.2. Provisions to indicate the quality of Real-time data to the System Operator; and
 - 1.3. Actions to address Real-time data quality issues with the entity(ies) responsible for providing the data when data quality affects Real-time Assessments.
- M1.** Each Transmission Operator shall have evidence that it implemented its Operating Process or Operating Procedure to address the quality of the Real-time data necessary to perform its Real-time monitoring and Real-time Assessments. This evidence could include, but is not limited to: 1) an Operating Process or Operating Procedure in electronic or hard copy format meeting all provisions of Requirement R1; and 2) evidence the Transmission Operator implemented the Operating Process or Operating Procedure as called for in the Operating Process or Operating Procedure, such as dated operator logs, dated checklists, voice recordings, voice transcripts, or other evidence.
- R2.** Each Balancing Authority shall implement an Operating Process or Operating Procedure to address the quality of the Real-time data necessary to perform its analysis functions and Real-time monitoring. The Operating Process or Operating Procedure shall include: *[Violation Risk Factor: High] [Time Horizon: Real-time Operations]*
 - 2.1. Criteria for evaluating the quality of Real-time data;
 - 2.2. Provisions to indicate the quality of Real-time data to the System Operator; and

- 2.3.** Actions to address Real-time data quality issues with the entity(ies) responsible for providing the data when data quality affects its analysis functions.
- M2.** Each Balancing Authority shall have evidence that it implemented its Operating Process or Operating Procedure to address the quality of the Real-time data necessary to perform its analysis functions and Real-time monitoring. This evidence could include, but is not limited to: 1) an Operating Process or Operating Procedure in electronic or hard copy format meeting all provisions of Requirement R2; and 2) evidence the Balancing Authority implemented the Operating Process or Operating Procedure as called for in the Operating Process or Operating Procedure, such as dated operator logs, dated checklists, voice recordings, voice transcripts, or other evidence.
- R3.** Each Transmission Operator shall implement an Operating Process or Operating Procedure to address the quality of analysis used in its Real-time Assessments. The Operating Process or Operating Procedure shall include: *[Violation Risk Factor: Medium] [Time Horizon: Real-time Operations]*
- 3.1.** Criteria for evaluating the quality of analysis used in its Real-time Assessments;
- 3.2.** Provisions to indicate the quality of analysis used in its Real-time Assessments; and
- 3.3.** Actions to address analysis quality issues affecting its Real-time Assessments.
- M3.** Each Transmission Operator shall have evidence it implemented its Operating Process or Operating Procedure to address the quality of analysis used in its Real-time Assessments as specified in Requirement R3. This evidence could include, but is not limited to: 1) an Operating Process or Operating Procedure in electronic or hard copy format meeting all provisions of Requirement R3; and 2) evidence the Transmission Operator implemented the Operating Process or Operating Procedure as called for in the Operating Process or Operating Procedure, such as dated operator logs, dated checklists, voice recordings, voice transcripts, or other evidence.
- R4.** Each Transmission Operator and Balancing Authority shall have an alarm process monitor that provides notification(s) to its System Operators when a failure of its Real-time monitoring alarm processor has occurred. *[Violation Risk Factor: Medium] [Time Horizon: Real-time Operations]*
- M4.** Each Transmission Operator and Balancing Authority shall have evidence of an alarm process monitor that provides notification(s) to its System Operators when a failure of its Real-time monitoring alarm processor has occurred. This evidence could include, but is not limited to, operator logs, computer printouts, system specifications, or other evidence.

C. Compliance

- 1. Compliance Monitoring Process**
- 1.1. Compliance Enforcement Authority:**

“Compliance Enforcement Authority” means NERC or the Regional Entity, or any entity as otherwise designated by an Applicable Governmental Authority, in their respective roles of monitoring and/or enforcing compliance with mandatory and enforceable Reliability Standards in their respective jurisdictions.

1.2. Evidence Retention:

The following evidence retention period(s) identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show it was compliant for the full-time period since the last audit.

The applicable entity shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

The applicable entity shall retain evidence of compliance for Requirements R1, R2, and R4, and Measures M1, M2, and M4 for the current calendar year and one previous calendar year, with the exception of operator logs and voice recordings which shall be retained for a minimum of 90 calendar days, unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

The Transmission Operator shall retain evidence of compliance for Requirement R3 and Measure M3 for a rolling 30-day period, unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

If an applicable entity is found non-compliant it shall keep information related to the non-compliance until mitigation is complete and approved or for the time specified above, whichever is longer.

1.3. Compliance Monitoring and Enforcement Program

As defined in the NERC Rules of Procedure, “Compliance Monitoring and Enforcement Program” refers to the identification of the processes used to evaluate data or information for the purpose of assessing performance or outcomes with the associated Reliability Standard.

Violation Severity Levels

| R # | Violation Severity Levels | | | |
|-----|---------------------------|--|--|---|
| | Lower VSL | Moderate VSL | High VSL | Severe VSL |
| R1. | N/A | The Transmission Operator's Operating Process or Operating Procedure to address the quality of the Real-time data necessary to perform its Real-time monitoring and Real-time Assessments did not include one of the elements listed in Part 1.1 through Part 1.3. | The Transmission Operator's Operating Process or Operating Procedure to address the quality of the Real-time data necessary to perform its Real-time monitoring and Real-time Assessments did not include two of the elements listed in Part 1.1 through Part 1.3. | The Transmission Operator's Operating Process or Operating Procedure to address the quality of the Real-time data necessary to perform its Real-time monitoring and Real-time Assessments did not include any of the elements listed in Part 1.1 through Part 1.3; OR The Transmission Operator did not implement an Operating Process or Operating Procedure to address the quality of the Real-time data necessary to perform its Real-time monitoring and Real-time Assessments. |
| R2. | N/A | The Balancing Authority's Operating Process or Operating Procedure to address the quality of the | The Balancing Authority's Operating Process or Operating Procedure to address the quality of the | The Balancing Authority's Operating Process or Operating Procedure to address the quality of the |

| | | | | |
|------------|-----|--|--|--|
| | | Real-time data necessary to perform its analysis functions and Real-time monitoring did not include one of the elements listed in Part 2.1 through Part 2.3. | Real-time data necessary to perform its analysis functions and Real-time monitoring did not include two of the elements listed in Part 2.1 through Part 2.3. | Real-time data necessary to perform its analysis functions and Real-time monitoring did not include any of the elements listed in Part 2.1 through Part 2.3; OR The Balancing Authority did not implement an Operating Process or Operating Procedure to address the quality of the Real-time data necessary to perform its analysis functions and Real-time monitoring. |
| R3. | N/A | The Transmission Operator's Operating Process or Operating Procedure to address the quality of analysis used in its Real-time Assessments did not include one of the elements listed in Part 3.1 through Part 3.3. | The Transmission Operator's Operating Process or Operating Procedure to address the quality of analysis used in its Real-time Assessments did not include two of the elements listed in Part 3.1 through Part 3.3. | The Transmission Operator's Operating Process or Operating Procedure to address the quality of analysis used in its Real-time Assessments did not include any of the elements listed in Part 3.1 through Part 3.3; OR The Transmission Operator did not implement an Operating Process or Operating Procedure to address the quality of |

TOP-010-1(i) – Real-time Reliability Monitoring and Analysis Capabilities

| | | | | |
|------------|-----|-----|--|--|
| | | | | analysis used in its Real-time Assessments. |
| R4. | N/A | N/A | The responsible entity has an alarm process monitor but the alarm process monitor did not provide notification(s) to its System Operators when a failure of its Real-time monitoring alarm processor occurred. | The responsible entity does not have an alarm process monitor that provides notification(s) to its System Operators when a failure of its Real-time monitoring alarm processor has occurred. |

D. Regional Variances

None.

E. Associated Documents

- [Implementation Plan](#)

Version History

| Version | Date | Action | Change Tracking |
|---------|--------------------|--|-----------------|
| 1 | October 30, 2015 | New standard developed in Project 2009-02 to respond to recommendations in Real-time Best Practices Task Force Report and FERC directives. | N/A |
| 1 | May 5, 2016 | Adopted by the Board of Trustees | New |
| 1 | September 22, 2016 | FERC Order issued approving TOP-010-1. Docket No. RD16-6-000 | |

TOP-010-1(i) – Real-time Reliability Monitoring and Analysis Capabilities

| | | | |
|------|--------------------|---|---------|
| 1(i) | September 22, 2016 | FERC directive to change Requirement 1 and Requirement 2 from 'medium' to 'high'. Docket No. RD16-6-000 | Revised |
| 1(i) | November 2, 2016 | Adopted by the Board of Trustees | New |

Guidelines and Technical Basis

Real-time monitoring, or *monitoring* the Bulk Electric System (BES) in Real-time, is a primary function of Reliability Coordinators (RCs), Transmission Operators (TOPs), and Balancing Authorities (BAs) as required by TOP and IRO Reliability Standards. As used in TOP and IRO Reliability Standards, monitoring involves observing operating status and operating values in Real-time for awareness of system conditions. Real-time monitoring may include the following activities performed in Real-time:

- Acquisition of operating data;
- Display of operating data as needed for visualization of system conditions;
- Audible or visual alerting when warranted by system conditions; and
- Audible or visual alerting when monitoring and analysis capabilities degrade or become unavailable.

Requirement R1

The TOP uses a set of Real-time data identified in TOP-003-3 Requirement R1 to perform its Real-time monitoring and Real-time Assessments. Functional requirements to perform monitoring and Real-time Assessments appear in other Reliability Standards.

The TOP's Operating Process or Operating Procedure must contain criteria for evaluating the quality of Real-time data as specified in proposed TOP-010-1 Requirement R1 Part 1.1. The criteria support identification of applicable data quality issues, which may include:

- Data outside of a prescribed data range;
- Analog data not updated within a predetermined time period;
- Data entered manually to override telemetered information; or
- Data otherwise identified as invalid or suspect.

The Operating Process or Operating Procedure must include provisions for indicating the quality of Real-time data to operating personnel. Descriptions of quality indicators such as display color codes, data quality flags, or other such indicators as found in Real-time monitoring specifications could be used.

Requirement R1 Part 1.3 specifies the TOP shall include actions to address Real-time data quality issues with the entity(ies) responsible for providing the data when data quality affects Real-time Assessments. Requirement R1 Part 1.3 is focused on addressing data point quality issues affecting Real-time Assessments. Other data quality issues of a lower priority are addressed according to an entity's operating practices and are not covered under Requirement R1 Part 1.3.

The TOP's actions to address data quality issues are steps within existing authorities and capabilities that provide awareness and enable the TOP to meet its obligations for performing the Real-time Assessment. Examples of actions to address data quality issues include, but are not limited to, the following:

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- Notifying entities that provide Real-time data to the TOP;
- Following processes established for resolving data conflicts as specified in TOP-003-3, or other applicable Reliability Standards;
- Taking corrective actions on the TOP's own data;
- Changing data sources or other inputs so that the data quality issue no longer affects the TOP's Real-time Assessment; and
- Inputting data manually and updating as necessary.

The Operating Process or Operating Procedure must clearly identify to operating personnel how to determine the data that affects the quality of the Real-time Assessment so that effective actions can be taken to address data quality issues in an appropriate timeframe.

Requirement R2

The BA uses a set of Real-time data identified in TOP-003-3 Requirement R2 to perform its analysis functions and Real-time monitoring. Requirements to perform monitoring appear in other Reliability Standards.

The BA's Operating Process or Operating Procedure must contain criteria for evaluating the quality of Real-time data as specified in proposed TOP-010-1 Requirement R2 Part 2.1. The criteria supports identification of applicable data quality issues, which may include:

- Data outside of a prescribed data range;
- Analog data not updated within a predetermined time period;
- Data entered manually to override telemetered information; or
- Data otherwise identified as invalid or suspect.

The Operating Process or Operating Procedure must include provisions for indicating the quality of Real-time data to operating personnel. Descriptions of quality indicators such as display color codes, data quality flags, or other such indicators as found in Real-time monitoring specifications could be used.

Requirement R2 Part 2.3 specifies the BA shall include in its Operating Process or Operating Procedure actions to address Real-time data quality issues when data quality affects its analysis functions. Requirement R2 Part 2.3 is focused on addressing data point quality issues affecting analysis functions. Other data quality issues of a lower priority are addressed according to an entity's operating practices and are not covered under Requirement R2 Part 2.3.

The BA's actions to address data quality issues are steps within existing authorities and capabilities that provide awareness and enable the BA to meet its obligations for performing its analysis functions. Examples of actions to address data quality issues include, but are not limited to, the following:

- Notifying entities that provide Real-time data to the BA;

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- Following processes established for resolving data conflicts as specified in TOP-003-3 or other applicable Reliability Standards;
- Taking corrective actions on the BA's own data;
- Changing data sources or other inputs so that the data quality issue no longer affects the BA's analysis functions; and
- Inputting data manually and updating as necessary.

The Operating Process or Operating Procedure must clearly identify to operating personnel how to determine the data that affects the analysis quality so that effective actions can be taken to address data quality issues in an appropriate timeframe.

Requirement R3

Requirement R3 ensures TOPs have procedures to address issues related to the quality of the analysis results used for Real-time Assessments. Requirements to perform Real-time Assessments appear in other Reliability Standards. Examples of the types of analysis used in Real-time Assessments may include, as applicable, state estimation, Real-time Contingency analysis, Stability analysis or other studies used for Real-time Assessments.

Examples of the types of criteria used to evaluate the quality of analysis used in Real-time Assessments may include solution tolerances, mismatches with Real-time data, convergences, etc.

The Operating Process or Operating Procedure must describe how the quality of analysis results used in Real-time Assessment will be shown to operating personnel.

Requirement R4

Requirement R4 addresses recommendation S7 of the Real-time Best Practices Task Force report concerning operator awareness of alarm availability.

An alarm process monitor could be an application within a Real-time monitoring system or it could be a separate system. 'Heartbeat' or 'watchdog' monitors are examples of an alarm process monitor. An alarm process monitor should be designed and implemented such that a stall of the Real-time monitoring alarm processor does not cause a failure of the alarm process monitor.

Rationale

Rationale for Requirement R1: The Transmission Operator (TOP) uses a set of Real-time data identified in TOP-003-3 Requirement R1 to perform its Real-time monitoring and Real-time Assessments. Functional requirements to perform Real-time monitoring and Real-time Assessments appear in other Reliability Standards.

The Operating Process or Operating Procedure must include provisions for indicating the quality of Real-time data to operating personnel. Descriptions of quality indicators such as display color codes, data quality flags, or other such indicators as found in Real-time monitoring specifications could be used.

Requirement R1 Part 1.3 of this standard specifies the TOP shall include actions to address Real-time data quality issues affecting its Real-time Assessments in its Operating Process or Operating Procedure. Examples of actions to address Real-time data quality issues are provided in the Guidelines and Technical Basis section. These actions could be the same as the process used to resolve data conflicts required by TOP-003-3 Requirement R5 Part 5.2, provided that this process addresses Real-time data quality issues.

The revision in Part 1.3 to address Real-time data quality issues *when data quality affects Real-time Assessments* clarifies the scope of data points that must be covered by the Operating Process or Operating Procedure.

Rationale for Requirement R2: The Balancing Authority (BA) uses a set of Real-time data identified in TOP-003-3 Requirement R2 to perform its analysis functions and Real-time monitoring. Requirements to perform monitoring appear in other Reliability Standards.

The Operating Process or Operating Procedure must include provisions for indicating the quality of Real-time data to operating personnel. Descriptions of quality indicators such as display color codes, data quality flags, or other such indicators as found in Real-time monitoring specifications could be used.

Requirement R2 Part 2.3 of this standard specifies the BA shall include actions to address Real-time data quality issues affecting its analysis functions in its Operating Process or Operating Procedure. Examples of actions to address Real-time data quality issues are provided in the Guidelines and Technical Basis section. These actions could be the same as the process to resolve data conflicts required by TOP-003-3 Requirement R5 Part 5.2 provided that this process addresses Real-time data quality issues.

The revision in Part 2.3 to address Real-time data quality issues *when data quality affects its analysis functions* clarifies the scope of data points that must be covered by the Operating Process or Operating Procedure.

Rationale for Requirement R3: Requirement R3 ensures TOPs have procedures to address issues related to the quality of the analysis results used for Real-time Assessments. Requirements to perform Real-time Assessments appear in other Reliability Standards. Examples of the types of analysis used in Real-time Assessments include, as applicable, state

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estimation, Real-time Contingency analysis, Stability analysis or other studies used for Real-time Assessments.

The Operating Process or Operating Procedure must include provisions for how the quality of analysis results used in Real-time Assessment will be shown to operating personnel. Operating personnel includes System Operators and staff responsible for supporting Real-time operations.

Rationale for Requirement R4: The requirement addresses recommendation S7 of the Real-time Best Practices Task Force report concerning operator awareness of alarm availability.

The requirement in Draft Two of the proposed standard has been revised for clarity by removing the term *independent*. The alarm process monitor must be able to provide notification of failure of the Real-time monitoring alarm processor. This capability could be provided by an application within a Real-time monitoring system or by a separate component used by the System Operator. The alarm process monitor must not fail with a simultaneous failure of the Real-time monitoring alarm processor.

Reliability Standard TOP-010-1(i)

Redline Version

A. Introduction

1. **Title:** Real-time Reliability Monitoring and Analysis Capabilities
2. **Number:** TOP-010-1(i)
3. **Purpose:** Establish requirements for Real-time monitoring and analysis capabilities to support reliable System operations.
4. **Applicability:**
 - 4.1. **Functional Entities:**
 - 4.1.1. Transmission Operators
 - 4.1.2. Balancing Authorities
5. **Effective Date:** See Implementation Plan

B. Requirements and Measures

- R1.** Each Transmission Operator shall implement an Operating Process or Operating Procedure to address the quality of the Real-time data necessary to perform its Real-time monitoring and Real-time Assessments. The Operating Process or Operating Procedure shall include: *[Violation Risk Factor: ~~Medium~~High] [Time Horizon: Real-time Operations]*
 - 1.1. Criteria for evaluating the quality of Real-time data;
 - 1.2. Provisions to indicate the quality of Real-time data to the System Operator; and
 - 1.3. Actions to address Real-time data quality issues with the entity(ies) responsible for providing the data when data quality affects Real-time Assessments.
- M1.** Each Transmission Operator shall have evidence that it implemented its Operating Process or Operating Procedure to address the quality of the Real-time data necessary to perform its Real-time monitoring and Real-time Assessments. This evidence could include, but is not limited to: 1) an Operating Process or Operating Procedure in electronic or hard copy format meeting all provisions of Requirement R1; and 2) evidence the Transmission Operator implemented the Operating Process or Operating Procedure as called for in the Operating Process or Operating Procedure, such as dated operator logs, dated checklists, voice recordings, voice transcripts, or other evidence.
- R2.** Each Balancing Authority shall implement an Operating Process or Operating Procedure to address the quality of the Real-time data necessary to perform its analysis functions and Real-time monitoring. The Operating Process or Operating Procedure shall include: *[Violation Risk Factor: ~~Medium~~High] [Time Horizon: Real-time Operations]*
 - 2.1. Criteria for evaluating the quality of Real-time data;
 - 2.2. Provisions to indicate the quality of Real-time data to the System Operator; and

- 2.3.** Actions to address Real-time data quality issues with the entity(ies) responsible for providing the data when data quality affects its analysis functions.
- M2.** Each Balancing Authority shall have evidence that it implemented its Operating Process or Operating Procedure to address the quality of the Real-time data necessary to perform its analysis functions and Real-time monitoring. This evidence could include, but is not limited to: 1) an Operating Process or Operating Procedure in electronic or hard copy format meeting all provisions of Requirement R2; and 2) evidence the Balancing Authority implemented the Operating Process or Operating Procedure as called for in the Operating Process or Operating Procedure, such as dated operator logs, dated checklists, voice recordings, voice transcripts, or other evidence.
- R3.** Each Transmission Operator shall implement an Operating Process or Operating Procedure to address the quality of analysis used in its Real-time Assessments. The Operating Process or Operating Procedure shall include: *[Violation Risk Factor: Medium] [Time Horizon: Real-time Operations]*
- 3.1.** Criteria for evaluating the quality of analysis used in its Real-time Assessments;
- 3.2.** Provisions to indicate the quality of analysis used in its Real-time Assessments; and
- 3.3.** Actions to address analysis quality issues affecting its Real-time Assessments.
- M3.** Each Transmission Operator shall have evidence it implemented its Operating Process or Operating Procedure to address the quality of analysis used in its Real-time Assessments as specified in Requirement R3. This evidence could include, but is not limited to: 1) an Operating Process or Operating Procedure in electronic or hard copy format meeting all provisions of Requirement R3; and 2) evidence the Transmission Operator implemented the Operating Process or Operating Procedure as called for in the Operating Process or Operating Procedure, such as dated operator logs, dated checklists, voice recordings, voice transcripts, or other evidence.
- R4.** Each Transmission Operator and Balancing Authority shall have an alarm process monitor that provides notification(s) to its System Operators when a failure of its Real-time monitoring alarm processor has occurred. *[Violation Risk Factor: Medium] [Time Horizon: Real-time Operations]*
- M4.** Each Transmission Operator and Balancing Authority shall have evidence of an alarm process monitor that provides notification(s) to its System Operators when a failure of its Real-time monitoring alarm processor has occurred. This evidence could include, but is not limited to, operator logs, computer printouts, system specifications, or other evidence.

C. Compliance

- 1. Compliance Monitoring Process**
- 1.1. Compliance Enforcement Authority:**

“Compliance Enforcement Authority” means NERC or the Regional Entity, or any entity as otherwise designated by an Applicable Governmental Authority, in their respective roles of monitoring and/or enforcing compliance with mandatory and enforceable Reliability Standards in their respective jurisdictions.

1.2. Evidence Retention:

The following evidence retention period(s) identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show it was compliant for the full-time period since the last audit.

The applicable entity shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

The applicable entity shall retain evidence of compliance for Requirements R1, R2, and R4, and Measures M1, M2, and M4 for the current calendar year and one previous calendar year, with the exception of operator logs and voice recordings which shall be retained for a minimum of 90 calendar days, unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

The Transmission Operator shall retain evidence of compliance for Requirement R3 and Measure M3 for a rolling 30-day period, unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

If an applicable entity is found non-compliant it shall keep information related to the non-compliance until mitigation is complete and approved or for the time specified above, whichever is longer.

1.3. Compliance Monitoring and Enforcement Program

As defined in the NERC Rules of Procedure, “Compliance Monitoring and Enforcement Program” refers to the identification of the processes used to evaluate data or information for the purpose of assessing performance or outcomes with the associated Reliability Standard.

Violation Severity Levels

| R # | Violation Severity Levels | | | |
|-----|---------------------------|--|--|---|
| | Lower VSL | Moderate VSL | High VSL | Severe VSL |
| R1. | N/A | The Transmission Operator's Operating Process or Operating Procedure to address the quality of the Real-time data necessary to perform its Real-time monitoring and Real-time Assessments did not include one of the elements listed in Part 1.1 through Part 1.3. | The Transmission Operator's Operating Process or Operating Procedure to address the quality of the Real-time data necessary to perform its Real-time monitoring and Real-time Assessments did not include two of the elements listed in Part 1.1 through Part 1.3. | The Transmission Operator's Operating Process or Operating Procedure to address the quality of the Real-time data necessary to perform its Real-time monitoring and Real-time Assessments did not include any of the elements listed in Part 1.1 through Part 1.3; OR The Transmission Operator did not implement an Operating Process or Operating Procedure to address the quality of the Real-time data necessary to perform its Real-time monitoring and Real-time Assessments. |
| R2. | N/A | The Balancing Authority's Operating Process or Operating Procedure to address the quality of the | The Balancing Authority's Operating Process or Operating Procedure to address the quality of the | The Balancing Authority's Operating Process or Operating Procedure to address the quality of the |

| | | | | |
|------------|-----|--|--|--|
| | | Real-time data necessary to perform its analysis functions and Real-time monitoring did not include one of the elements listed in Part 2.1 through Part 2.3. | Real-time data necessary to perform its analysis functions and Real-time monitoring did not include two of the elements listed in Part 2.1 through Part 2.3. | Real-time data necessary to perform its analysis functions and Real-time monitoring did not include any of the elements listed in Part 2.1 through Part 2.3; OR The Balancing Authority did not implement an Operating Process or Operating Procedure to address the quality of the Real-time data necessary to perform its analysis functions and Real-time monitoring. |
| R3. | N/A | The Transmission Operator's Operating Process or Operating Procedure to address the quality of analysis used in its Real-time Assessments did not include one of the elements listed in Part 3.1 through Part 3.3. | The Transmission Operator's Operating Process or Operating Procedure to address the quality of analysis used in its Real-time Assessments did not include two of the elements listed in Part 3.1 through Part 3.3. | The Transmission Operator's Operating Process or Operating Procedure to address the quality of analysis used in its Real-time Assessments did not include any of the elements listed in Part 3.1 through Part 3.3; OR The Transmission Operator did not implement an Operating Process or Operating Procedure to address the quality of |

| | | | | |
|------------|-----|-----|--|--|
| | | | | analysis used in its Real-time Assessments. |
| R4. | N/A | N/A | The responsible entity has an alarm process monitor but the alarm process monitor did not provide notification(s) to its System Operators when a failure of its Real-time monitoring alarm processor occurred. | The responsible entity does not have an alarm process monitor that provides notification(s) to its System Operators when a failure of its Real-time monitoring alarm processor has occurred. |

D. Regional Variances

None.

E. Associated Documents

- [Implementation Plan](#)

Version History

| Version | Date | Action | Change Tracking |
|----------|---------------------------|--|-----------------|
| 1 | October 30, 2015 | New standard developed in Project 2009-02 to respond to recommendations in Real-time Best Practices Task Force Report and FERC directives. | N/A |
| 1 | May 5, 2016 | Adopted by the Board of Trustees | New |
| <u>1</u> | <u>September 22, 2016</u> | <u>FERC Order issued approving TOP-010-1. Docket No. RD16-6-000</u> | |

TOP-010-1(i) – Real-time Reliability Monitoring and Analysis Capabilities

| | | | |
|-------------|---------------------------|--|----------------|
| <u>1(i)</u> | <u>September 22, 2016</u> | <u>FERC directive to change Requirement 1 and Requirement 2 from 'medium' to 'high'. Docket No. RD16-6-000</u> | <u>Revised</u> |
| <u>1(i)</u> | <u>November 2, 2016</u> | <u>Adopted by the Board of Trustees</u> | <u>New</u> |

Guidelines and Technical Basis

Real-time monitoring, or *monitoring* the Bulk Electric System (BES) in Real-time, is a primary function of Reliability Coordinators (RCs), Transmission Operators (TOPs), and Balancing Authorities (BAs) as required by TOP and IRO Reliability Standards. As used in TOP and IRO Reliability Standards, monitoring involves observing operating status and operating values in Real-time for awareness of system conditions. Real-time monitoring may include the following activities performed in Real-time:

- Acquisition of operating data;
- Display of operating data as needed for visualization of system conditions;
- Audible or visual alerting when warranted by system conditions; and
- Audible or visual alerting when monitoring and analysis capabilities degrade or become unavailable.

Requirement R1

The TOP uses a set of Real-time data identified in TOP-003-3 Requirement R1 to perform its Real-time monitoring and Real-time Assessments. Functional requirements to perform monitoring and Real-time Assessments appear in other Reliability Standards.

The TOP's Operating Process or Operating Procedure must contain criteria for evaluating the quality of Real-time data as specified in proposed TOP-010-1 Requirement R1 Part 1.1. The criteria support identification of applicable data quality issues, which may include:

- Data outside of a prescribed data range;
- Analog data not updated within a predetermined time period;
- Data entered manually to override telemetered information; or
- Data otherwise identified as invalid or suspect.

The Operating Process or Operating Procedure must include provisions for indicating the quality of Real-time data to operating personnel. Descriptions of quality indicators such as display color codes, data quality flags, or other such indicators as found in Real-time monitoring specifications could be used.

Requirement R1 Part 1.3 specifies the TOP shall include actions to address Real-time data quality issues with the entity(ies) responsible for providing the data when data quality affects Real-time Assessments. Requirement R1 Part 1.3 is focused on addressing data point quality issues affecting Real-time Assessments. Other data quality issues of a lower priority are addressed according to an entity's operating practices and are not covered under Requirement R1 Part 1.3.

The TOP's actions to address data quality issues are steps within existing authorities and capabilities that provide awareness and enable the TOP to meet its obligations for performing the Real-time Assessment. Examples of actions to address data quality issues include, but are not limited to, the following:

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- Notifying entities that provide Real-time data to the TOP;
- Following processes established for resolving data conflicts as specified in TOP-003-3, or other applicable Reliability Standards;
- Taking corrective actions on the TOP's own data;
- Changing data sources or other inputs so that the data quality issue no longer affects the TOP's Real-time Assessment; and
- Inputting data manually and updating as necessary.

The Operating Process or Operating Procedure must clearly identify to operating personnel how to determine the data that affects the quality of the Real-time Assessment so that effective actions can be taken to address data quality issues in an appropriate timeframe.

Requirement R2

The BA uses a set of Real-time data identified in TOP-003-3 Requirement R2 to perform its analysis functions and Real-time monitoring. Requirements to perform monitoring appear in other Reliability Standards.

The BA's Operating Process or Operating Procedure must contain criteria for evaluating the quality of Real-time data as specified in proposed TOP-010-1 Requirement R2 Part 2.1. The criteria supports identification of applicable data quality issues, which may include:

- Data outside of a prescribed data range;
- Analog data not updated within a predetermined time period;
- Data entered manually to override telemetered information; or
- Data otherwise identified as invalid or suspect.

The Operating Process or Operating Procedure must include provisions for indicating the quality of Real-time data to operating personnel. Descriptions of quality indicators such as display color codes, data quality flags, or other such indicators as found in Real-time monitoring specifications could be used.

Requirement R2 Part 2.3 specifies the BA shall include in its Operating Process or Operating Procedure actions to address Real-time data quality issues when data quality affects its analysis functions. Requirement R2 Part 2.3 is focused on addressing data point quality issues affecting analysis functions. Other data quality issues of a lower priority are addressed according to an entity's operating practices and are not covered under Requirement R2 Part 2.3.

The BA's actions to address data quality issues are steps within existing authorities and capabilities that provide awareness and enable the BA to meet its obligations for performing its analysis functions. Examples of actions to address data quality issues include, but are not limited to, the following:

- Notifying entities that provide Real-time data to the BA;

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- Following processes established for resolving data conflicts as specified in TOP-003-3 or other applicable Reliability Standards;
- Taking corrective actions on the BA's own data;
- Changing data sources or other inputs so that the data quality issue no longer affects the BA's analysis functions; and
- Inputting data manually and updating as necessary.

The Operating Process or Operating Procedure must clearly identify to operating personnel how to determine the data that affects the analysis quality so that effective actions can be taken to address data quality issues in an appropriate timeframe.

Requirement R3

Requirement R3 ensures TOPs have procedures to address issues related to the quality of the analysis results used for Real-time Assessments. Requirements to perform Real-time Assessments appear in other Reliability Standards. Examples of the types of analysis used in Real-time Assessments may include, as applicable, state estimation, Real-time Contingency analysis, Stability analysis or other studies used for Real-time Assessments.

Examples of the types of criteria used to evaluate the quality of analysis used in Real-time Assessments may include solution tolerances, mismatches with Real-time data, convergences, etc.

The Operating Process or Operating Procedure must describe how the quality of analysis results used in Real-time Assessment will be shown to operating personnel.

Requirement R4

Requirement R4 addresses recommendation S7 of the Real-time Best Practices Task Force report concerning operator awareness of alarm availability.

An alarm process monitor could be an application within a Real-time monitoring system or it could be a separate system. 'Heartbeat' or 'watchdog' monitors are examples of an alarm process monitor. An alarm process monitor should be designed and implemented such that a stall of the Real-time monitoring alarm processor does not cause a failure of the alarm process monitor.

Rationale

Rationale for Requirement R1: The Transmission Operator (TOP) uses a set of Real-time data identified in TOP-003-3 Requirement R1 to perform its Real-time monitoring and Real-time Assessments. Functional requirements to perform Real-time monitoring and Real-time Assessments appear in other Reliability Standards.

The Operating Process or Operating Procedure must include provisions for indicating the quality of Real-time data to operating personnel. Descriptions of quality indicators such as display color codes, data quality flags, or other such indicators as found in Real-time monitoring specifications could be used.

Requirement R1 Part 1.3 of this standard specifies the TOP shall include actions to address Real-time data quality issues affecting its Real-time Assessments in its Operating Process or Operating Procedure. Examples of actions to address Real-time data quality issues are provided in the Guidelines and Technical Basis section. These actions could be the same as the process used to resolve data conflicts required by TOP-003-3 Requirement R5 Part 5.2, provided that this process addresses Real-time data quality issues.

The revision in Part 1.3 to address Real-time data quality issues *when data quality affects Real-time Assessments* clarifies the scope of data points that must be covered by the Operating Process or Operating Procedure.

Rationale for Requirement R2: The Balancing Authority (BA) uses a set of Real-time data identified in TOP-003-3 Requirement R2 to perform its analysis functions and Real-time monitoring. Requirements to perform monitoring appear in other Reliability Standards.

The Operating Process or Operating Procedure must include provisions for indicating the quality of Real-time data to operating personnel. Descriptions of quality indicators such as display color codes, data quality flags, or other such indicators as found in Real-time monitoring specifications could be used.

Requirement R2 Part 2.3 of this standard specifies the BA shall include actions to address Real-time data quality issues affecting its analysis functions in its Operating Process or Operating Procedure. Examples of actions to address Real-time data quality issues are provided in the Guidelines and Technical Basis section. These actions could be the same as the process to resolve data conflicts required by TOP-003-3 Requirement R5 Part 5.2 provided that this process addresses Real-time data quality issues.

The revision in Part 2.3 to address Real-time data quality issues *when data quality affects its analysis functions* clarifies the scope of data points that must be covered by the Operating Process or Operating Procedure.

Rationale for Requirement R3: Requirement R3 ensures TOPs have procedures to address issues related to the quality of the analysis results used for Real-time Assessments. Requirements to perform Real-time Assessments appear in other Reliability Standards. Examples of the types of analysis used in Real-time Assessments include, as applicable, state

estimation, Real-time Contingency analysis, Stability analysis or other studies used for Real-time Assessments.

The Operating Process or Operating Procedure must include provisions for how the quality of analysis results used in Real-time Assessment will be shown to operating personnel. Operating personnel includes System Operators and staff responsible for supporting Real-time operations.

Rationale for Requirement R4: The requirement addresses recommendation S7 of the Real-time Best Practices Task Force report concerning operator awareness of alarm availability.

The requirement in Draft Two of the proposed standard has been revised for clarity by removing the term *independent*. The alarm process monitor must be able to provide notification of failure of the Real-time monitoring alarm processor. This capability could be provided by an application within a Real-time monitoring system or by a separate component used by the System Operator. The alarm process monitor must not fail with a simultaneous failure of the Real-time monitoring alarm processor.