## FEDERAL ENERGY REGULATORY COMMISSION WASHINGTON, D.C. 20426

## OFFICE OF ELECTRIC RELIABILITY

North American Electric Reliability Corporation Docket No. RD17-4-000

## April 17, 2017

North American Electric Reliability Corporation 1325 G Street N.W., Suite 600 Washington, D.C. 20005

Attention:	Shamai Elstein Counsel for North American Electric Reliability Corporation
Reference:	Petition of the North American Electric Reliability Corporation for Approval of Proposed Reliability Standards IRO-002-5 and TOP-001-4

Dear Mr. Elstein:

On March 6, 2017, the North American Electric Reliability Corporation (NERC) filed a petition for approval of proposed Reliability Standards IRO-002-5 (Reliability Coordination - Monitoring and Analysis) and TOP-001-4 (Transmission Operations). NERC states that the proposed Reliability Standards address the Commission's directives in Order No. 817<sup>1</sup> related to: (1) transmission operator monitoring of non-bulk electric system (BES) facilities; (2) redundancy and diverse routing of transmission operator, balancing authority, and reliability coordinator data exchange capabilities; and (3) testing of alternative or less frequently used data exchange capabilities.<sup>2</sup>

NERC states that the proposed "Reliability Standards TOP-001-4 and IRO-002-5 build upon the improvements made in the prior versions of those standards to further advance reliability."<sup>3</sup> Proposed Reliability Standard TOP-001-4, Requirement R10 has been revised to require the transmission operator to monitor non-BES facilities for

<sup>1</sup> Transmission Operations Reliability Standards and Interconnection Reliability Operations and Coordination Reliability Standards, Order No. 817, 153 FERC ¶ 61,178 (2015).

<sup>2</sup> NERC Petition at 1.

<sup>3</sup> *Id*. at 13.

determining system operating limit exceedances within its transmission operator area, as directed by the Commission in Order No. 817.<sup>4</sup> NERC states that this revision helps to ensure that all facilities that can adversely impact reliability are monitored.<sup>5</sup>

NERC also revised proposed Reliability Standard TOP-001-4 to require that the operator's and balancing authority's data exchange capabilities for the exchange of realtime data needed for real-time monitoring and analysis have redundant and diversely routed data exchange infrastructure within the entity's primary control center and that these capabilities be tested for redundant functionality on a regular basis. Similar revisions are reflected in Reliability Standard IRO-002-5 to clarify the obligations of the reliability coordinator. NERC states that these modifications help support reliable operations by preventing a single point of failure in primary control center data exchange infrastructure from halting the flow of real-time data used by operators to monitor and control the BES.<sup>6</sup> NERC requests that the Commission approve proposed Reliability Standards TOP-001-4 and IRO-002-5 as consistent with its directives in Order No. 817 and find that the proposed Reliability Standards are just, reasonable, not unduly discriminatory or preferential, and in the public interest.

NERC's filing was noticed on March 6, 2017, with interventions, comments and protests due on or before April 10, 2017. No interventions, comments or protests were received.

NERC's uncontested petition is hereby approved pursuant to the relevant authority delegated to the Director, Office of Electric Reliability under 18 C.F.R. § 375.303 (2016), effective as of the date of this order.

This action shall not be construed as approving any other application, including proposed revisions of Electric Reliability Organization or Regional Entity rules or procedures pursuant to 18 C.F.R. § 375.303(a)(2)(i). Such action shall not be deemed as recognition of any claimed right or obligation associated therewith and such action is without prejudice to any findings or orders that have been or may hereafter be made by the Commission in any proceeding now pending or hereafter instituted by or against the Electric Reliability Organization or any Regional Entity.

<sup>4</sup> Order No. 817, 153 FERC ¶ 61,178 at P 35.

<sup>5</sup> NERC Petition at 3.

<sup>6</sup> Id. at 3-4.

This order constitutes final agency action. Requests for rehearing by the Commission may be filed within 30 days of the date of issuance of this order, pursuant to 18 C.F.R. § 385.713 (2016).

Sincerely,

Michael Bardee, Director Office of Electric Reliability