FERC-725A (OMB Control No.:1902-0244)
Order in Docket No. RD21-4-000, issued 4/07/2021

Supporting Statement
FERC-725A, Mandatory Reliability Standards for the Bulk Power System

The existing information collection requirements in the currently effective Mandatory Reliability Standards, are approved by OMB under FERC-725A (OMB Control No.1902-0244).

1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY

On August 8, 2005, the Electricity Modernization Act of 2005, which is Title XII, Subtitle A, of the Energy Policy Act of 2005 (EPAct 2005), was enacted into law. EPAct 2005 added a new section 215 to the FPA, which requires a Commission-certified Electric Reliability Organization (ERO) (FERC-725) to develop mandatory and enforceable Reliability Standards, which are subject to Commission review and approval. Once approved, the Reliability Standards may be enforced by the ERO, subject to Commission oversight or the Commission can independently enforce Reliability Standards (FERC-725A).

On February 3, 2006, the Commission issued Order No. 672, implementing section 215 of the Federal Power Act (FPA). Pursuant to Order No. 672, the Commission certified one organization, NERC, as the ERO. The ERO is required to develop Reliability Standards, which are subject to Commission review and approval. The Reliability Standards will apply to users, owners and operators of the Bulk-Power System, as set forth in each Reliability Standard.

On March 16, 2007, the Commission issued Order No. 693, a Final Rule adding part 40, a new part, to the Commission's regulations. The Final Rule states that this part applies to all users, owners and operators of the Bulk-Power System within the United States (other than Alaska or Hawaii). It also requires that each Reliability Standard identify the subset of users, owners and operators to which that Reliability Standard applies. The new regulations also require that each Reliability Standard that is approved by the Commission will be maintained on the ERO's Internet website for public inspection.

In order that the Commission is able to perform its oversight function with regard to Reliability Standards that are proposed by the ERO and established by the Commission, it is essential that the Commission receive timely information regarding all or potential violations of Reliability Standards. While section 215 of the FPA contemplates the filing of the record of an ERO or Regional Entity enforcement action, FERC needs information regarding violations and potential violations at or near the time of occurrence. Therefore, it will work with the ERO and regional reliability organizations to be able to use the electronic filing of information, so the Commission receives timely information. The new regulations also require that each Reliability Standard that is approved by the Commission will be maintained on the ERO's Internet website for public inspection.

In accordance with section 39.5 of the Commission's regulations, the ERO must file each Reliability Standard or a modification to a Reliability Standard with the Commission. The filing is to include a concise statement of the basis and purpose of the proposed Reliability Standard, either a summary of the Reliability development proceedings conducted by the ERO or a summary of the Reliability Standard development proceedings conducted by a Regional Entity

together with a summary of the Reliability Standard review proceedings of the ERO and a demonstration that the proposed Reliability Standard is "just, reasonable, not unduly discriminatory or preferential, and in the public interest.

RD21-4 (FAC-008-05)

The proposed information collection changes in Docket No. RD21–4–000 relates to the proposed Reliability Standard FAC-008-05 (Facility Ratings) developed by the North American Electric Reliability Corporation (NERC), and submitted to the Commission for approval. The Commission received NERC's petition to approve the proposed Reliability Standards.
On February 19, 2021, NERC filed a petition seeking approval of proposed Reliability Standard FAC-008-5. NERC states that proposed Reliability Standard FAC-008-5 reflects the retirement of Requirement R7 of the currently effective standard. NERC notes that this proposal was recommended following the first phase of work under the NERC Standards Efficiency Review and that in its Order No. 873 remanding a previously proposed version of the FAC-008 Reliability Standard, the Commission agreed that the retirement of Requirement R7 from the standard would not result in a reliability gap.

In June 2019, following the conclusion of the standard development process, NERC submitted a series of standard retirement proposals to the Commission. Among the proposals, NERC submitted for Commission approval proposed Reliability Standard FAC-008-4, in which NERC proposed to retire Requirements R7 and R8 of currently effective Reliability Standard FAC-008-3. In September 2020, the Commission issued Order No. 873 regarding NERC's retirement proposals. In this order, the Commission remanded proposed Reliability Standard FAC-008-4 to NERC for further consideration, citing concerns with the proposed retirement of Requirement R8 of the currently effective standard. The standard drafting team determined to develop a new version of the Reliability Standard, proposed Reliability Standard FAC-008-5, in which only Requirement R7 of the currently effective standard would be proposed for retirement. Reliability Standard FAC-008-5 Requirement R7 requires Generator Owners and Transmission Owners to provide certain information to requesting Reliability Coordinator(s), Planning Coordinator(s), Transmission Planner(s), Transmission Owner(s), and Transmission Operator(s) regarding their Facilities, as follows:

R7. Each Generator Owner shall provide Facility Ratings (for its solely and jointly owned Facilities that are existing Facilities, new Facilities, modifications to existing Facilities and re-ratings of existing Facilities) to its associated Reliability Coordinator(s), Planning Coordinator(s), Transmission Planner(s), Transmission Owner(s) and Transmission Operator(s) as scheduled by such requesting entities.

In the years since Reliability Standard FAC-008-5 was developed, NERC has developed other Reliability Standards that render the data provision obligations of Requirement R7 redundant., Requirement R1 of Reliability Standard TOP-003-3 – Operational Reliability Data requires the Transmission Operator to maintain a documented data specification (Requirement R1) and for the Transmission Owner and Generator Owner to provide the requested data (Requirement R5). Once approved, the Reliability Standards may be enforced by the ERO, subject to Commission oversight, or by the Commission independently.

2. HOW, BY WHOM, AND FOR WHAT PURPOSE THE INFORMATION IS TO BE USED AND THE CONSEQUENCES OF NOT COLLECTING THE INFORMATION

In general, information collection and record retention requirements related to Reliability Standards are not submitted to, or retained for audit by, FERC. Rather they are submitted to, or retained for audit by, NERC or the Compliance Enforcement Authority, as specified in each individual Reliability Standard. Without collecting this information, reliability of the bulk-power system could become compromised, potentially resulting in outages.

1. **FAC-008-5**

Requirements

R1. Each Generator Owner shall have documentation for determining the Facility Ratings of its solely and jointly owned generator Facilities up to the low side terminals of the main step up transformer if the Generator Owner does not own the main step up transformer and the high side terminals of the main step up transformer if the Generator Owner owns the main step up transformer.

1.1. The documentation shall contain assumptions used to rate the generator and at least one of the following:

• Design or construction information such as design criteria, ratings provided by equipment manufacturers, equipment drawings and/or specifications, engineering analyses, method(s) consistent with industry standards (e.g. ANSI and IEEE), or an established engineering practice that has been verified by testing or engineering analysis.

• Operational information such as commissioning test results, performance testing or historical performance records, any of which may be supplemented by engineering analyses.

1.2. The documentation shall be consistent with the principle that the Facility Ratings do not exceed the most limiting applicable Equipment Rating of the individual equipment that comprises that Facility.

R2. Each Generator Owner shall have a documented methodology for determining Facility Ratings (Facility Ratings methodology) of its solely and jointly owned equipment connected between the location specified in R1 and the point of interconnection with the Transmission Owner that contains all the following.

2.1. The methodology used to establish the Ratings of the equipment that comprises the Facility(ies) shall be consistent with at least one of the following:

• Ratings provided by equipment manufacturers or obtained from equipment manufacturer specifications such as nameplate rating.

• One or more industry standards developed through an open process such as Institute of Electrical and Electronic Engineers (IEEE) or International Council on Large Electric Systems (CIGRE).

• A practice that has been verified by testing, performance history or engineering analysis.

2.2. The underlying assumptions, design criteria, and methods used to determine the Equipment Ratings identified in Requirement R2, Part 2.1 including identification of how each of the following were considered:

2.2.1. Equipment Rating standard(s) used in development of this methodology.

2.2.2. Ratings provided by equipment manufacturers or obtained from equipment manufacturer specifications.

2.2.3. Ambient conditions (for particular or average conditions or as they vary in real-time).

2.2.4. Operating limitations.

2.3. A statement that a Facility Rating shall respect the most limiting applicable Equipment Rating of the individual equipment that comprises that Facility.

2.4. The process by which the Rating of equipment that comprises a Facility is determined.

2.4.1. The scope of equipment addressed shall include, but not be limited to conductors, transformers, relay protective devices, terminal equipment, and series and shunt compensation devices.

2.4.2. The scope of Ratings addressed shall include, as a minimum, both Normal and Emergency Ratings.

R3. Each Transmission Owner shall have a documented methodology for determining Facility Ratings (Facility Ratings methodology) of its solely and jointly owned Facilities (except for those generating unit Facilities addressed in R1 and R2) that contains all the following:

3.1. The methodology used to establish the Ratings of the equipment that comprises the Facility shall be consistent with at least one of the following:

• Ratings provided by equipment manufacturers or obtained from equipment manufacturer specifications such as nameplate rating.

• One or more industry standards developed through an open process such as Institute of Electrical and Electronics Engineers (IEEE) or International Council on Large Electric Systems (CIGRE).

• A practice that has been verified by testing, performance history or engineering analysis. 3.2. The underlying assumptions, design criteria, and methods used to determine the Equipment Ratings identified in Requirement R3, Part 3.1 including identification of how each of the following were considered:

3.2.1. Equipment Rating standard(s) used in development of this methodology. Such as temporary de-ratings of impaired equipment in accordance with good utility practice.

3.2.2. Ratings provided by equipment manufacturers or obtained from equipment manufacturer specifications.

3.2.3. Ambient conditions (for particular or average conditions or as they vary in real-time).

3.2.4. Operating limitations.

3.3. A statement that a Facility Rating shall respect the most limiting applicable Equipment Rating of the individual equipment that comprises that Facility.

3.4. The process by which the Rating of equipment that comprises a Facility is determined.

3.4.1. The scope of equipment addressed shall include, but not be limited to, transmission conductors, transformers, relay protective devices, terminal equipment, and series and shunt compensation devices.

3.4.2. The scope of Ratings addressed shall include, as a minimum, both Normal and Emergency Ratings.

R4. Each Transmission Owner shall make its Facility Ratings methodology and each Generator Owner shall each make its documentation for determining its Facility Ratings and its Facility Ratings methodology available for inspection and technical review by those Reliability Coordinators, Transmission Operators, Transmission Planners and Planning Coordinators that have responsibility for the area in which the associated Facilities are located, within 21 calendar days of receipt of a request.

R5. If a Reliability Coordinator, Transmission Operator, Transmission Planner or Planning Coordinator provides documented comments on its technical review of a Transmission Owner’s Facility Ratings methodology or Generator Owner’s documentation for determining its Facility Ratings and its Facility Rating methodology, the Transmission Owner or Generator Owner shall provide a response to that commenting entity within 45 calendar days of receipt of those comments. The response shall indicate whether a change will be made to the Facility Ratings methodology and, if no change will be made to that Facility Ratings methodology, the reason why.

R6. Each Transmission Owner and Generator Owner shall have Facility Ratings for its solely and jointly owned Facilities that are consistent with the associated Facility Ratings methodology or documentation for determining its Facility Ratings.

R7. Each Generator Owner shall provide Facility Ratings (for its solely and jointly owned Facilities that are existing Facilities, new Facilities, modifications to existing Facilities and re-ratings of existing Facilities) to its associated Reliability Coordinator(s), Planning Coordinator(s), Transmission Planner(s), Transmission Owner(s) and Transmission Operator(s) as scheduled by such requesting entities.

R8. Each Transmission Owner (and each Generator Owner subject to Requirement R2) shall provide requested information as specified below (for its solely and jointly owned Facilities that are existing Facilities, new Facilities, modifications to existing Facilities and re-ratings of existing Facilities) to its associated Reliability Coordinator(s), Planning Coordinator(s),

8.1. As scheduled by the requesting entities:

8.1.1. Facility Ratings

8.1.2. Identity of the most limiting equipment of the Facilities

8.2. Within 30 calendar days (or a later date if specified by the requester), for any requested Facility with a Thermal Rating that limits the use of Facilities under the requester's authority by causing any of the following: 1) An Interconnection Reliability Operating Limit, 2) A limitation of Total Transfer Capability, 3) An impediment to generator deliverability, or 4) An impediment to service to a major load center:

8.2.1. Identity of the existing next most limiting equipment of the Facility

8.2.2. The Thermal Rating for the next most limiting equipment identified in Requirement R8, Part 8.2.1.

Measures

M1. Each Generator Owner shall have documentation that shows how its Facility Ratings were determined as identified in Requirement 1.

M2. Each Generator Owner shall have a documented Facility Ratings methodology that includes all the items identified in Requirement 2, Parts 2.1 through 2.4.

M3. Each Transmission Owner shall have a documented Facility Ratings methodology that includes all the items identified in Requirement 3, Parts 3.1 through 3.4.

M4. Each Transmission Owner shall have evidence, such as a copy of a dated electronic note, or other comparable evidence to show that it made its Facility Ratings methodology available for inspection within 21 calendar days of a request in accordance with Requirement 4. The Generator Owner shall have evidence, such as a copy of a dated electronic note, or other comparable evidence to show that it made its documentation for determining its Facility Ratings or its Facility Ratings methodology available for inspection within 21 calendar days of a request

in accordance with Requirement R4. (Retirement approved by NERC BOT pending applicable regulatory approval.)

M5. If the Reliability Coordinator, Transmission Operator, Transmission Planner or Planning Coordinator provides documented comments on its technical review of a Transmission Owner's or Generator Owner's Facility Ratings methodology or a Generator Owner's documentation for determining its Facility Ratings, the Transmission Owner or Generator Owner shall have evidence, (such as a copy of a dated electronic or hard copy note, or other comparable evidence from the Transmission Owner or Generator Owner addressed to the commenter that includes the response to the comment,) that it provided a response to that commenting entity in accordance with Requirement R5. (Retirement approved by NERC BOT pending applicable regulatory approval.)

M6. Each Transmission Owner and Generator Owner shall have evidence to show that its Facility Ratings are consistent with the documentation for determining its Facility Ratings as specified in Requirement R1 or consistent with its Facility Ratings methodology as specified in Requirements R2 and R3 (Requirement R6).

M7. Each Generator Owner shall have evidence, such as a copy of a dated electronic note, or other comparable evidence to show that it provided its Facility Ratings to its associated Reliability Coordinator(s), Planning Coordinator(s), Transmission Planner(s), Transmission Owner(s) and Transmission Operator(s) in accordance with Requirement R7.

M8. Each Transmission Owner (and Generator Owner subject to Requirement R2) shall have evidence, such as a copy of a dated electronic note, or other comparable evidence to show that it provided its Facility Ratings and identity of limiting equipment to its associated Reliability Coordinator(s), Planning Coordinator(s), Transmission Planner(s), Transmission Owner(s) and Transmission Operator(s) in accordance with Requirement R8.

Data Retention

The Generator Owner shall keep its current documentation (for R1) and any modifications to the documentation that were in force since last compliance audit period for Measure M1 and Measure M6. The Generator Owner shall keep its current, in force Facility Ratings methodology (for R2) and any modifications to the methodology that were in force since last compliance audit period for Measure M2 and Measure M6. The Transmission Owner shall keep its current, in force Facility Ratings methodology (for R3) and any modifications to the methodology that were in force since the last compliance audit for Measure M3 and Measure M6.The Transmission Owner and Generator Owner shall keep its current, in force Facility Ratings and any changes to those ratings for three calendar years for Measure M6. The Generator Owner and Transmission Owner shall each keep evidence for Measure M4, and Measure M5, for three calendar years. (Retirement approved by FERC effective January 21, 2014.) The Generator Owner shall keep evidence for Measure M7 for three calendar years. The Transmission Owner (and Generator Owner that is subject to Requirement R2) shall keep evidence for Measure M8 for three calendar years. If a Generator Owner or Transmission Owner is found non-compliant, it shall keep

information related to the non-compliance until found compliant. The Compliance Enforcement Authority shall keep the last audit and all subsequent compliance records.

2. **INT-006-5**

Requirements and Measures

R1. Each Balancing Authority shall approve or deny each on-time Arranged Interchange or emergency Arranged Interchange that it receives and shall do so prior to the expiration of the time period defined in Attachment 1, Column B.

1.1. Each Source and Sink Balancing Authority shall deny the Arranged Interchange or curtail Confirmed Interchange if it does not expect to be capable of supporting the magnitude of the Interchange, including ramping, throughout the duration of the Arranged Interchange.

1.2. Each Balancing Authority shall deny the Arranged Interchange or curtail Confirmed Interchange if the Scheduling Path (proper connectivity of Adjacent Balancing Authorities) between it and its Adjacent Balancing Authorities is invalid.

M1. Each Balancing Authority shall have evidence (such as dated and time stamped electronic logs, or other evidence) that it responded to each request for its approval to transition an Arranged Interchange to a Confirmed Interchange within the time defined in Attachment 1, Column B. (R1)

R2. Each Transmission Service Provider shall approve or deny each on-time Arranged Interchange or emergency Arranged Interchange that it receives and shall do so prior to the expiration of the time period defined in Attachment 1, Column B.

2.1. Each Transmission Service Provider shall deny the Arranged Interchange or curtail Confirmed Interchange if the transmission path (proper connectivity of adjacent Transmission Service Providers) between it and its adjacent Transmission Service Providers is invalid.

M2. Each Transmission Service Provider shall have evidence (such as dated and time stamped electronic logs, studies, or other evidence) that it responded to each Arranged Interchange or emergency Arranged Interchange within the time defined in Attachment 1, Column B. If the transmission path between the Transmission Service Provider and its adjacent Transmission Service Providers is invalid, each Transmission Service Provider shall have evidence (such as dated and time stamped electronic logs, studies, or other evidence) that it denied the Arranged Interchange or curtailed confirmed Interchange. (R2)

R3. The Source Balancing Authority and the Sink Balancing Authority receiving a Reliability Adjustment Arranged Interchange shall approve or deny it prior to the expiration of the time period defined in Attachment 1, Column B.

M3. Each Balancing Authority shall have evidence (such as dated and time stamped electronic logs, studies, or other evidence) that when responding to a Reliability Adjustment Arranged Interchange, it either approved the request or denied the request.

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 that 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 Balancing Authority shall maintain evidence to show compliance with R1and R3 for the most recent three calendar months plus the current month.

• The Transmission Service Provider shall maintain evidence to show compliance with R2 for the most recent three calendar months plus the current month.

• If a Balancing Authority or Transmission Service Provider is found noncompliant, it shall keep information related to the non-compliance until found compliant. The Compliance Enforcement Authority shall keep the last audit records, and all requested and submitted subsequent audit record.

3. **INT-009-3**

Requirements and Measures

R1. Each Balancing Authority shall agree with each of its Adjacent Balancing Authorities that its Composite Confirmed Interchange with that Adjacent Balancing Authority, at mutually agreed upon time intervals, excluding Dynamic Schedules and Pseudo-Ties and including any Interchange not yet captured in the Composite Confirmed Interchange, is:

1.1. Identical in magnitude to that of the Adjacent Balancing Authority, and

1.2. Opposite in sign or direction to that of the Adjacent Balancing Authority.

M1. The Balancing Authority shall have evidence (such as dated logs, voice recordings, electronic records, or other evidence) that its Composite Confirmed Interchange, excluding Dynamic Schedules and Pseudo-Ties and including any Interchange not yet captured in the Composite Confirmed Interchange, was agreed to by each Adjacent Balancing Authority, identical in magnitude to those of each Adjacent Balancing Authority, and opposite in sign to that of each Adjacent Balancing Authority. (R1)

R2. Reserved.

M2. Reserved.

R3. Each Balancing Authority in whose area the high-voltage direct current tie is controlled shall coordinate the Confirmed Interchange prior to its implementation with the Transmission Operator of the high-voltage direct current tie.

M3. The Balancing Authority shall have evidence (such as dated logs, electronic records, or other evidence) that it coordinated the Confirmed Interchange prior to its implementation with the Transmission Operator of the high-voltage direct current tie.

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 that 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 Balancing Authority shall maintain evidence to show compliance with R1 and R3 for the most recent 3 months plus the current month. If a Balancing Authority is found non-compliant, it shall keep information related to the non-compliance until found compliant. The Compliance Enforcement Authority shall keep the last audit records, and all requested and submitted subsequent audit records.

4. **PER-003-2**

Requirements and Measures

R1. Each Reliability Coordinator shall staff its Real-time operating positions performing Reliability Coordinator reliability-related tasks with System Operators who have demonstrated minimum competency in the areas listed by obtaining and maintaining a valid NERC Reliability Operator certificate

M1. Each Reliability Coordinator shall have the following evidence to show that it staffed its Real-time operating positions performing reliability-related tasks with System Operators who have demonstrated the applicable minimum competency by obtaining and maintaining the appropriate, valid NERC certificate:

M1.1 A list of Real-time operating positions.

M1.2 A list of System Operators assigned to its Real-time operating positions.

M1.3 A copy of each of its System Operator’s NERC certificate or NERC certificate number with expiration date which demonstrates compliance with the applicable Areas of Competency.

M1.4 Work schedules, work logs, or other equivalent evidence showing which System Operators were assigned to work in Real-time operating positions.

R2. Each Transmission Operator shall staff its Real-time operating positions performing Transmission Operator reliability-related tasks with System Operators who have demonstrated minimum competency in the areas listed by obtaining and maintaining one of the following valid NERC certificates

M2. Each Transmission Operator shall have the following evidence to show that it staffed its Real-time operating positions performing reliability-related tasks with System Operators who have demonstrated the applicable minimum competency by obtaining and maintaining the appropriate, valid NERC certificate:

M2.1 A list of Real-time operating positions.

M2.2 A list of System Operators assigned to its Real-time operating positions.

M2.3 A copy of each of its System Operator's NERC certificate or NERC certificate number with expiration date which demonstrates compliance with the applicable Areas of Competency.

M2.4 Work schedules, work logs, or other equivalent evidence showing which System Operators were assigned to work in Real-time operating positions.

R3. Each Balancing Authority shall staff its Real-time operating positions performing Balancing Authority reliability-related tasks with System Operators who have demonstrated minimum competency in the areas listed by obtaining and maintaining one of the following valid NERC certificates

3.1. Areas of Competency

3.1.1. Resources and demand balancing

3.1.2. Emergency preparedness and operations

3.1.3. System operations

3.1.4. Interchange scheduling and coordination

3.2. Certificates

• Reliability Operator

• Balancing, Interchange and Transmission Operator

• Balancing and Interchange Operator

M3. Each Balancing Authority shall have the following evidence to show that it staffed its Real-time operating positions performing reliability-related tasks with System Operators who have demonstrated the applicable minimum competency by obtaining and maintaining the appropriate, valid NERC certificate:

M3.1 A list of Real-time operating positions.

M3.2 A list of System Operators assigned to its Real-time operating positions.

M3.3 A copy of each of its System Operator's NERC certificate or NERC certificate number with expiration date which demonstrates compliance with the applicable Areas of Competency.

M3.4 Work schedules, work logs, or other equivalent evidence showing which System Operators were assigned to work in Real-time operating positions. Reliability Standards in their respective

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 that 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.

• Each Reliability Coordinator, Transmission Operator and Balancing Authority shall keep data or evidence for three years or since its last compliance audit, whichever time frame is the greatest.

5. **PRC-008-0**

Requirements

R1. The Transmission Owner and Distribution Provider with a UFLS program (as required by its Regional Reliability Organization) shall have a UFLS equipment maintenance and testing program in place. This UFLS equipment maintenance and testing program shall include UFLS equipment identification, the schedule for UFLS equipment testing, and the schedule for UFLS equipment maintenance.

R2. The Transmission Owner and Distribution Provider with a UFLS program (as required by its Regional Reliability Organization) shall implement its UFLS equipment maintenance and testing program and shall provide UFLS maintenance and testing program results to its Regional Reliability Organization and NERC on request (within 30 calendar days).

Measures

M1. Each Transmission Owner's and Distribution Provider's UFLS equipment maintenance and testing program contains the elements specified in Reliability Standard PRC-008-0_R1.

M2. Each Transmission Owner and Distribution Provider shall have evidence that it provided the results of its UFLS equipment maintenance and testing program's implementation to its Regional Reliability Organization and NERC on request (within 30 calendar days).

Data Retention: None specified.

6. **PRC-011-0**

Requirements

R1. The Transmission Owner and Distribution Provider that owns a UVLS system shall have a UVLS equipment maintenance and testing program in place. This program shall include:

R1.1. The UVLS system identification which shall include but is not limited to:

R1.1.1. Relays.

R1.1.2. Instrument transformers.

R1.1.3. Communications systems, where appropriate.

R1.1.4. Batteries.

R1.2. Documentation of maintenance and testing intervals and their basis.

R1.3. Summary of testing procedure.

R1.4. Schedule for system testing.

R1.5. Schedule for system maintenance.

R1.6. Date last tested/maintained.

R2. The Transmission Owner and Distribution Provider that owns a UVLS system shall provide documentation of its UVLS equipment maintenance and testing program and the implementation of that UVLS equipment maintenance and testing program to its Regional Reliability Organization and NERC on request (within 30 calendar days).

Measures

M1. Each Transmission Owner and Distribution Provider that owns a UVLS system shall have documentation that its UVLS equipment maintenance and testing program conforms with Reliability Standard PRC-011-0_R1.

M2. Each Transmission Owner and Distribution Provider that owns a UVLS system shall have evidence it provided documentation of its UVLS equipment maintenance and testing program and the implementation of that UVLS equipment maintenance and testing program as specified in Reliability Standard PRC-011-0_R2.

Data Retention: None specified.

7. **PRC-017-1**

Requirements

R1. The Transmission Owner, Generator Owner, and Distribution Provider that owns a RAS shall have a system maintenance and testing program(s) in place. The program(s) shall include:

R1.1. RAS identification shall include but is not limited to:

R1.1.1. Relays.

R1.1.2. Instrument transformers.

R1.1.3. Communications systems, where appropriate.

R1.1.4. Batteries.

R1.2. Documentation of maintenance and testing intervals and their basis.

R1.3. Summary of testing procedure.

R1.4. Schedule for system testing.

R1.5. Schedule for system maintenance.

R1.6. Date last tested/maintained.

R2. The Transmission Owner, Generator Owner, and Distribution Provider that owns a RAS shall provide documentation of the program and its implementation to the appropriate Regional Reliability Organizations and NERC on request (within 30 calendar days).

Measures

M1. The Transmission Owner, Generator Owner, and Distribution Provider that owns a RAS shall have a system maintenance and testing program(s) in place that includes all items in Reliability Standard PRC-017-1_R1.

M2. The Transmission Owner, Generator Owner, and Distribution Provider that owns a RAS shall have evidence it provided documentation of the program and its implementation to the appropriate Regional Reliability Organizations and NERC on request (within 30 calendar days)

Evidence Retention: N/A

8. **PRC-018-1**

Requirements

R1. Each Transmission Owner and Generator Owner required to install DMEs by its Regional Reliability Organization (reliability standard PRC-002 Requirements 1-3) shall have DMEs installed that meet the following requirements:

R1.1. Internal Clocks in DME devices shall be synchronized to within 2 milliseconds or

less of Universal Coordinated Time scale (UTC)

R1.2. Recorded data from each Disturbance shall be retrievable for ten calendar days.

R2. The Transmission Owner and Generator Owner shall each install DMEs in accordance with its Regional Reliability Organization's installation requirements (reliability standard PRC-002 Requirements 1 through 3).

R3. The Transmission Owner and Generator Owner shall each maintain, and report to its Regional Reliability Organization on request, the following data on the DMEs installed to meet that region's installation requirements (reliability standard PRC-002 Requirements 1.1, 2.1 and 3.1):

R3.1. Type of DME (sequence of event recorder, fault recorder, or dynamic disturbance

recorder).

R3.2. Make and model of equipment.

R3.3. Installation location.

R3.4. Operational status.

R3.5. Date last tested.

R3.6. Monitored elements, such as transmission circuit, bus section, etc.

R3.7. Monitored devices, such as circuit breaker, disconnect status, alarms, etc.

R3.8. Monitored electrical quantities, such as voltage, current, etc.

R4. The Transmission Owner and Generator Owner shall each provide Disturbance data (recorded by DMEs) in accordance with its Regional Reliability Organization's requirements (reliability standard PRC-002 Requirement 4).

R5. The Transmission Owner and Generator Owner shall each archive all data recorded by DMEs for Regional Reliability Organization-identified events for at least three years.

R6. Each Transmission Owner and Generator Owner that is required by its Regional Reliability Organization to have DMEs shall have a maintenance and testing program for those DMEs that includes:

R6.1. Maintenance and testing intervals and their basis.

R6.2. Summary of maintenance and testing procedures.

Measures

M1. The Transmission Owner and Generator Owner shall each have evidence that DMEs it is required to have meet the functional requirements specified in Requirement 1 and are installed in accordance with its associated Regional Reliability Organization's requirements (R2).

M2. The Transmission Owner and Generator Owner shall each maintain the data listed in Requirements 3.1 through 3.8 for the DMEs installed to meet its Regional Reliability Organization's DME installation requirements.

M2.1 The Transmission Owner and Generator Owner shall each have evidence it provided this DME data to its Regional Reliability Organization within 30 calendar days of a request.

M3. The Transmission Owner and Generator Owner shall each have evidence it retained and provided recorded Disturbance data to entities in accordance with its associated Regional Reliability Organization's Disturbance data reporting requirements. (R4 R5)

M4. Each Transmission Owner and Generator Owner that is required to install DMEs to meet its Regional Reliability Organization's DME installation requirements, shall have an associated DME maintenance and testing program as defined in Requirement 6.

Data Retention

The Transmission Owner and Generator Owner shall each retain any Disturbance data provided to the Regional Reliability Organization (Requirement 4) for three years. The Compliance Monitor shall retain any audit data for three years.

9. TOP-001-5

Requirements and Measures

R1. Each Transmission Operator shall act to maintain the reliability of its Transmission Operator Area via its own actions or by issuing Operating Instructions.

M1. Each Transmission Operator shall have and provide evidence which may include but is not limited to dated operator logs, dated records, dated and time-stamped voice recordings or dated transcripts of voice recordings, electronic communications, or equivalent documentation, that will be used to determine that it acted to maintain the reliability of its Transmission Operator Area via its own actions or by issuing Operating Instructions.

R2. Each Balancing Authority shall act to maintain the reliability of its Balancing Authority Area via its own actions or by issuing Operating Instructions.

M2. Each Balancing Authority shall have and provide evidence which may include but is not limited to dated operator logs, dated records, dated and time-stamped voice recordings or dated transcripts of voice recordings, electronic communications, or equivalent documentation, that will be used to determine that it acted to maintain the reliability of its Balancing Authority Area via its own actions or by issuing Operating Instructions.

R3. Each Balancing Authority, Generator Operator, and Distribution Provider shall comply with each Operating Instruction issued by its Transmission Operator(s), unless such action cannot be physically implemented or it would violate safety, equipment, regulatory, or statutory requirements.

M3. Each Balancing Authority, Generator Operator, and Distribution Provider shall make available upon request, evidence that it complied with each Operating Instruction issued by the Transmission Operator(s) unless such action could not be physically implemented or it would have violated safety, equipment, regulatory, or statutory requirements. Such evidence could include but is not limited to dated operator logs, voice recordings or transcripts of voice recordings, electronic communications, or other equivalent evidence in electronic or hard copy format. In such cases, the Balancing Authority, Generator Operator, and Distribution Provider shall have and provide copies of the safety, equipment, regulatory, or statutory requirements as evidence for not complying with the Transmission Operator's Operating Instruction. If such a situation has not occurred, the Balancing Authority, Generator Operator, or Distribution Provider may provide an attestation.

R4. Each Balancing Authority, Generator Operator, and Distribution Provider shall inform its Transmission Operator of its inability to comply with an Operating Instruction issued by its Transmission Operator.

M4. Each Balancing Authority, Generator Operator, and Distribution Provider shall make available upon request, evidence which may include but is not limited to dated operator logs, voice recordings or transcripts of voice recordings, electronic communications, or equivalent evidence in electronic or hard copy format, that it informed its Transmission Operator of its inability to comply with its Operating Instruction issued. If such a situation has not occurred, the Balancing Authority, Generator Operator, or Distribution Provider may provide an attestation.

R5. Each Transmission Operator, Generator Operator, and Distribution Provider shall comply with each Operating Instruction issued by its Balancing Authority, unless such action cannot be physically implemented, or it would violate safety, equipment, regulatory, or statutory requirements

M5. Each Transmission Operator, Generator Operator, and Distribution Provider shall make available upon request, evidence that it complied with each Operating Instruction issued by its Balancing Authority unless such action could not be physically implemented or it would have violated safety, equipment, regulatory, or statutory requirements. Such evidence could include but is not limited to dated operator logs, voice recordings or transcripts of voice recordings, electronic communications, or other equivalent evidence in electronic or hard copy format. In such cases, the Transmission Operator, Generator Operator, and Distribution Provider shall have and provide copies of the safety, equipment, regulatory, or statutory requirements as evidence for not complying with the Balancing Authority's Operating Instruction. If such a situation has not occurred, the Transmission Operator, Generator Operator, or Distribution Provider may provide an attestation.

R6. Each Transmission Operator, Generator Operator, and Distribution Provider shall inform its Balancing Authority of its inability to comply with an Operating Instruction issued by its Balancing Authority.

M6. Each Transmission Operator, Generator Operator, and Distribution Provider shall make available upon request, evidence which may include but is not limited to dated operator logs, voice recordings or transcripts of voice recordings, electronic communications, or equivalent evidence in electronic or hard copy format, that it informed its Balancing Authority of its inability to comply with its Operating Instruction. If such a situation has not occurred, the Transmission Operator, Generator Operator, or Distribution Provider may provide an attestation.

R7. Each Transmission Operator shall assist other Transmission Operators within its Reliability Coordinator Area, if requested and able, provided that the requesting Transmission Operator has implemented its comparable Emergency procedures, unless such assistance cannot be physically implemented or would violate safety, equipment, regulatory, or statutory requirements.

M7. Each Transmission Operator shall make available upon request, evidence that comparable requested assistance, if able, was provided to other Transmission Operators within its Reliability

Coordinator Area unless such assistance could not be physically implemented or would have violated safety, equipment, regulatory, or statutory requirements. Such evidence could include but is not limited to dated operator logs, voice recordings or transcripts of voice recordings, electronic communications, or other equivalent evidence in electronic or hard copy format. If no request for assistance was received, the Transmission Operator may provide an attestation.

R8. Each Transmission Operator shall inform its Reliability Coordinator, known impacted Balancing Authorities, and known impacted Transmission Operators of its actual or expected operations that result in, or could result in, an Emergency.

M8. Each Transmission Operator shall make available upon request, evidence that it informed its Reliability Coordinator, known impacted Balancing Authorities, and known impacted Transmission Operators of its actual or expected operations that result in, or could result in, an Emergency. Such evidence could include but is not limited to dated operator logs, voice recordings or transcripts of voice recordings, electronic communications, or other equivalent evidence. If no such situations have occurred, the Transmission Operator may provide an attestation.

R9. Each Balancing Authority and Transmission Operator shall notify its Reliability Coordinator and known impacted interconnected entities of all planned outages, and unplanned outages of 30 minutes or more, for telemetering and control equipment, monitoring and assessment capabilities, and associated communication channels between the affected entities.

M9. Each Balancing Authority and Transmission Operator shall make available upon request, evidence that it notified its Reliability Coordinator and known impacted interconnected entities of all planned outages, and unplanned outages of 30 minutes or more, for telemetering and control equipment, monitoring and assessment capabilities, and associated communication channels. Such evidence could include but is not limited to dated operator logs, voice recordings or transcripts of voice recordings, electronic communications, or other equivalent evidence. If such a situation has not occurred, the Balancing Authority or Transmission Operator may provide an attestation.

R10. Each Transmission Operator shall perform the following for determining System Operating Limit (SOL) exceedances within its Transmission Operator Area:

10.1. Monitor Facilities within its Transmission Operator Area;

10.2. Monitor the status of Remedial Action Schemes within its Transmission Operator Area;

10.3. Monitor non-BES facilities within its Transmission Operator Area identified as necessary by the Transmission Operator;

10.4. Obtain and utilize status, voltages, and flow data for Facilities outside its Transmission Operator Area identified as necessary by the Transmission Operator;

10.5. Obtain and utilize the status of Remedial Action Schemes outside its Transmission Operator Area identified as necessary by the Transmission Operator;

10.6. Obtain and utilize status, voltages, and flow data for non-BES facilities outside its Transmission Operator Area identified as necessary by the Transmission Operator.

M10. Each Transmission Operator shall have, and provide upon request, evidence that could include but is not limited to Energy Management System description documents, computer printouts, Supervisory Control and Data Acquisition (SCADA) data collection, or other equivalent evidence that will be used to confirm that it monitored or obtained and utilized data as required to determine any System Operating Limit (SOL) exceedances within its Transmission Operator Area.

R11. Each Balancing Authority shall monitor its Balancing Authority Area, including the status of Remedial Action Schemes that impact generation or Load, in order to maintain generation-Load-interchange balance within its Balancing Authority Area and support Interconnection frequency.

M11. Each Balancing Authority shall have, and provide upon request, evidence that could include but is not limited to Energy Management System description documents, computer printouts, SCADA data collection, or other equivalent evidence that will be used to confirm that it monitors its Balancing Authority Area, including the status of Remedial Action Schemes that impact generation or Load, in order to maintain generation-Load-interchange balance within its Balancing Authority Area and support Interconnection frequency.

R12. Each Transmission Operator shall not operate outside any identified Interconnection Reliability Operating Limit (IROL) for a continuous duration exceeding its associated IROL Tv.

M12. Each Transmission Operator shall make available evidence to show that for any occasion in which it operated outside any identified Interconnection Reliability Operating Limit (IROL); the continuous duration did not exceed its associated IROL Tv. Such evidence could include but is not limited to dated computer logs or reports in electronic or hard copy format specifying the date, time, duration, and details of the excursion. If such a situation has not occurred, the Transmission Operator may provide an attestation that an event has not occurred.

R13. Each Transmission Operator shall ensure that a Real-time Assessment is performed at least once every 30 minutes.

M13. Each Transmission Operator shall have, and make available upon request, evidence to show it ensured that a Real-Time Assessment was performed at least once every 30 minutes. This evidence could include but is not limited to dated computer logs showing times the assessment was conducted, dated checklists, or other evidence.

R14. Each Transmission Operator shall initiate its Operating Plan to mitigate a SOL exceedance identified as part of its Real-time monitoring or Real-time Assessment.

M14. Each Transmission Operator shall have evidence that it initiated its Operating Plan for mitigating SOL exceedances identified as part of its Real-time monitoring or Real-time Assessments. This evidence could include but is not limited to dated computer logs showing times the Operating Plan was initiated, dated checklists, or other evidence.

R15. Each Transmission Operator shall inform its Reliability Coordinator of actions taken to return the System to within limits when a SOL has been exceeded.

M15. Each Transmission Operator shall make available evidence that it informed its Reliability Coordinator of actions taken to return the System to within limits when a SOL was exceeded. Such evidence could include but is not limited to dated operator logs, voice recordings or transcripts of voice recordings, or dated computer printouts. If such a situation has not occurred, the Transmission Operator may provide an attestation.

R16. Each Transmission Operator shall provide its System Operators with the authority to approve planned outages and maintenance of its telemetering and control equipment, monitoring and assessment capabilities, and associated communication channels between affected entities.

M16. Each Transmission Operator shall have, and provide upon request, evidence that could include but is not limited to a documented procedure or equivalent evidence that will be used to confirm that the Transmission Operator has provided its System Operators with the authority to approve planned outages and maintenance of telemetering and control equipment, monitoring and assessment capabilities, and associated communication channels between affected entities.

R17. Each Balancing Authority shall provide its System Operators with the authority to approve planned outages and maintenance of its telemetering and control equipment, monitoring and assessment capabilities, and associated communication channels between affected entities.

M17. Each Balancing Authority shall have, and provide upon request, evidence that could include but is not limited to a documented procedure or equivalent evidence that will be used to confirm that the Balancing Authority has provided its System Operators with the authority to approve planned outages and maintenance of its telemetering and control equipment, monitoring and assessment capabilities, and associated communication channels between affected entities.

R18. Each Transmission Operator shall operate to the most limiting parameter in instances where there is a difference in SOLs.

M18. Each Transmission Operator shall have, and provide upon request, evidence that could include but is not limited to operator logs, voice recordings, electronic communications, or equivalent evidence that will be used to determine if it operated to the most limiting parameter in instances where there is a difference in SOLs.

R19. Reserved.

M19. Reserved.

R20. Each Transmission Operator shall have data exchange capabilities, with redundant and diversely routed data exchange infrastructure within the Transmission Operator's primary Control Center, for the exchange of Real-time data with its Reliability Coordinator, Balancing Authority, and the entities it has identified it needs data from in order for it to perform its Real-time monitoring and Real-time Assessments.

M20. Each Transmission Operator shall have, and provide upon request, evidence that could include, but is not limited to, system specifications, system diagrams, or other

documentation that lists its data exchange capabilities, including redundant and diversely routed data exchange infrastructure within the Transmission Operator's primary Control Center, for the exchange of Real-time data with its Reliability Coordinator, Balancing Authority, and the entities it has identified it needs data from in order to perform its Real-time monitoring and Real-time Assessments as specified in the requirement.

R21. Each Transmission Operator shall test its primary Control Center data exchange capabilities specified in Requirement R20 for redundant functionality at least once every 90 calendar days. If the test is unsuccessful, the Transmission Operator shall initiate action within two hours to restore redundant functionality.

M21. Each Transmission Operator shall have, and provide upon request, evidence that it tested its primary Control Center data exchange capabilities specified in Requirement

R20 for the redundant functionality or experienced an event that demonstrated the redundant functionality; and, if the test was unsuccessful, initiated action within two hours to restore redundant functionality as specified in Requirement R21. Evidence could include but is not limited to: dated and time-stamped test records, operator logs, voice recordings, or electronic communications.

R22. Reserved.

M22. Reserved.

R23. Each Balancing Authority shall have data exchange capabilities, with redundant and diversely routed data exchange infrastructure within the Balancing Authority's primary Control Center, for the exchange of Real-time data with its Reliability Coordinator, Transmission Operator, and the entities it has identified it needs data from in order for it to perform its Real-time monitoring and analysis functions.

M23. Each Balancing Authority shall have, and provide upon request, evidence that could include, but is not limited to, system specifications, system diagrams, or other documentation that lists its data exchange capabilities, including redundant and diversely routed data exchange infrastructure within the Balancing Authority's primary Control Center, for the exchange of Real-time data with its Reliability Coordinator, Transmission Operator, and the entities it has identified it needs data from in order to perform its Real-time monitoring and analysis functions as specified in the requirement.

R24. Each Balancing Authority shall test its primary Control Center data exchange capabilities specified in Requirement R23 for redundant functionality at least once every 90 calendar days. If the test is unsuccessful, the Balancing Authority shall initiate action within two hours to restore redundant functionality.

M24. Each Balancing Authority shall have, and provide upon request, evidence that it tested its primary Control Center data exchange capabilities specified in Requirement R23 for redundant functionality, or experienced an event that demonstrated the redundant functionality; and, if the test was unsuccessful, initiated action within two hours to restore redundant functionality as specified in Requirement R24. Evidence could include but is not limited to: dated and time-stamped test records, operator logs, voice recordings, or electronic communications.

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 that 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.

- Each Balancing Authority, Transmission Operator, Generator Operator, and Distribution Provider shall each keep data or evidence for each applicable Requirement R1 through R11, and Measure M1 through M11, 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 90calendar days, unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.
- Each Transmission Operator shall retain evidence for three calendar years of any occasion in which it has exceeded an identified IROL and its associated IROL Tv as specified in Requirement R12 and Measure M12.
- Each Transmission Operator shall keep data or evidence for Requirement R13and Measure M13 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.
- Each Transmission Operator shall retain evidence and that it initiated its Operating Plan to mitigate a SOL exceedance as specified in Requirement R14and Measurement M14 for three calendar years.
- Each Transmission Operator and Balancing Authority shall each keep data or evidence for each applicable Requirement R15 through R18, and Measure M15through M18 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.
- Each Transmission Operator shall keep data or evidence for Requirement R20 and Measure M20 for the current calendar year and one previous calendar year.

- Each Transmission Operator shall keep evidence for Requirement R21 and Measure M21 for the most recent twelve calendar months, with the exception of operator logs and voice recordings which shall be retained for a minimum of 90 calendar days.
- Each Balancing Authority shall keep data or evidence for Requirement R23 and Measure M23 for the current calendar year and one previous calendar year.
- Each Balancing Authority shall keep evidence for Requirement R24 and Measure M24 for the most recent twelve calendar months, with the exception of operator logs and voice recordings which shall be retained for a minimum of 90 calendar days.

10. TOP-002-4

Requirements and Measures

R1. Each Transmission Operator shall have an Operational Planning Analysis that will allow it to assess whether its planned operations for the next day within its Transmission Operator Area will exceed any of its System Operating Limits (SOLs).

M1. Each Transmission Operator shall have evidence of a completed Operational Planning Analysis. Such evidence could include but is not limited to dated power flow study results.

R2. Each Transmission Operator shall have an Operating Plan(s) for next-day operations to address potential System Operating Limit (SOL) exceedances identified as a result of its Operational Planning Analysis as required in Requirement R1.

M2. Each Transmission Operator shall have evidence that it has an Operating Plan to address potential System Operating Limits (SOLs) exceedances identified as a result of the Operational Planning Analysis performed in Requirement R1. Such evidence could include but it is not limited to plans for precluding operating in excess of each SOL that was identified as a result of the Operational Planning Analysis.

R3. Each Transmission Operator shall notify entities identified in the Operating Plan(s) cited in Requirement R2 as to their role in those plan(s).

M3. Each Transmission Operator shall have evidence that it notified entities identified in the Operating Plan(s) cited in Requirement R2 as to their role in the plan(s). Such evidence could include but is not limited to dated operator logs, or e-mail records.

R4. Each Balancing Authority shall have an Operating Plan(s) for the next-day that Addresses:

4.1 Expected generation resource commitment and dispatch

4.2 Interchange scheduling

4.3 Demand patterns

4.4 Capacity and energy reserve requirements, including deliverability capability

M4. Each Balancing Authority shall have evidence that it has developed a plan to operate within the criteria identified. Such evidence could include but is not limited to dated operator logs or e-mail records.

R5. Each Balancing Authority shall notify entities identified in the Operating Plan(s) cited in Requirement R4 as to their role in those plan(s).

M5. Each Balancing Authority shall have evidence that it notified entities identified in the plan(s) cited in Requirement R4 as to their role in the plan(s). Such evidence could include but is not limited to dated operator logs or e-mail records.

R6. Each Transmission Operator shall provide its Operating Plan(s) for next-day operations identified in Requirement R2 to its Reliability Coordinator.

M6. Each Transmission Operator shall have evidence that it provided its Operating Plan(s) for next-day operations identified in Requirement R2 to its Reliability Coordinator. Such evidence could include but is not limited to dated operator logs or e-mail records.

R7. Each Balancing Authority shall provide its Operating Plan(s) for next-day operations identified in Requirement R4 to its Reliability Coordinator.

M7. Each Balancing Authority shall have evidence that it provided its Operating Plan(s) for next-day operations identified in Requirement R4 to its Reliability Coordinator. Such evidence could include but is not limited to dated operator logs or e-mail records.

Data Retention

The following evidence retention periods 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 that it was compliant for the full time period since the last audit. Each Transmission Operator and Balancing Authority shall keep data or evidence to show compliance for each applicable Requirement for a rolling 90-calendar days period for analyses, the most recent 90-calendar days for voice recordings, and 12 months for operating logs and e-mail records unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation. If a Transmission Operator or Balancing Authority is found non-compliant, it shall keep information related to the non-compliance until found compliant or the time period specified above, whichever is longer. The Compliance Enforcement Authority shall keep the last audit records, and all requested and submitted subsequent audit records

11. TOP-003-4

Requirements and Measures

R1. Each Transmission Operator shall maintain a documented specification for the data necessary for it to perform its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments. The data specification shall include, but not be limited to:

1.1. A list of data and information needed by the Transmission Operator to support its Operational Planning Analyses, Real-time monitoring, and Realtime Assessments including non-BES data and external network data as deemed necessary by the Transmission Operator.

1.2. Provisions for notification of current Protection System and Special Protection

System status or degradation that impacts System reliability.

1.3. A periodicity for providing data.

1.4. The deadline by which the respondent is to provide the indicated data.

M1. Each Transmission Operator shall make available its dated, current, in force

documented specification for data.

R2. Each Balancing Authority shall maintain a documented specification for the data

necessary for it to perform its analysis functions and Real-time monitoring. The data

specification shall include, but not be limited to:

2.1. A list of data and information needed by the Balancing Authority to support

its analysis functions and Real-time monitoring.

2.2. Provisions for notification of current Protection System and Special Protection

System status or degradation that impacts System reliability.

2.3. A periodicity for providing data.

2.4. The deadline by which the respondent is to provide the indicated data.

M2. Each Balancing Authority shall make available its dated, current, in force documented

specification for data.

R3. Each Transmission Operator shall distribute its data specification to entities that have

data required by the Transmission Operator's Operational Planning Analyses, Realtime monitoring, and Real-time Assessment.

M3. Each Transmission Operator shall make available evidence that it has distributed its

data specification to entities that have data required by the Transmission Operator's

Operational Planning Analyses, Real-time monitoring, and Real-time Assessments.

Such evidence could include but is not limited to web postings with an electronic notice of the posting, dated operator logs, voice recordings, postal receipts showing the recipient, date and contents, or e-mail records.

R4. Each Balancing Authority shall distribute its data specification to entities that have data required by the Balancing Authority's analysis functions and Real-time monitoring.

M4. Each Balancing Authority shall make available evidence that it has distributed its data specification to entities that have data required by the Balancing Authority's analysis functions and Real-time monitoring. Such evidence could include but is not limited to web postings with an electronic notice of the posting, dated operator logs, voice recordings, postal receipts showing the recipient, or e-mail records.

R5. Each Transmission Operator, Balancing Authority, Generator Owner, Generator Operator, Transmission Owner, and Distribution Provider receiving a data specification in Requirement R3 or R4 shall satisfy the obligations of the documented specifications using:

5.1. A mutually agreeable format

5.2. A mutually agreeable process for resolving data conflicts

5.3. A mutually agreeable security protocol

M5. Each Transmission Operator, Balancing Authority, Generator Owner, Generator Operator, Transmission Owner, and Distribution Provider receiving a data specification in Requirement R3 or R4 shall make available evidence that it has satisfied the obligations of the documented specifications. Such evidence could include, but is not limited to, electronic or hard copies of data transmittals or attestations of receiving entities.

Data Retention

The following evidence retention periods 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 that it was compliant for the full time period since the last audit. Each responsible 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: Each Transmission Operator shall retain its dated, current, in force, documented specification for the data necessary for it to perform its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments in accordance with Requirement R1 and Measurement M1 as well as any documents in force since the last compliance audits. Each Balancing Authority shall retain its dated, current, in force, documented specification for the data necessary for it to perform its analysis functions and Real-time monitoring in accordance with Requirement R2 and Measurement M2 as well as any documents in force since the last compliance audit. Each Transmission Operator shall retain evidence for three calendar years that it has distributed its data specification to entities that have data required by the Transmission Operator's Operational Planning Analyses, Real-time monitoring, and Real-time Assessments in accordance with Requirement R3 and Measurement M3.Each Balancing Authority shall retain evidence for three calendar years that it has distributed its data specification to entities that have data required by the Balancing Authority's analysis functions and Real-time monitoring in accordance with Requirement R4 and Measurement M4. Each Balancing Authority, Generator Owner, Generator Operator, Transmission Operator, Transmission Owner, and Distribution Provider receiving a data specification in Requirement R3 or R4 shall retain evidence for the most recent 90-calendar days that it has satisfied the obligations of the documented specifications in accordance with Requirement R5 and Measurement M5. If a responsible entity is found non-compliant, it shall keep information related to the non-compliance until mitigation is complete and approved or the time period specified above, whichever is longer. The Compliance Enforcement Authority shall keep the last audit records, and all requested and submitted subsequent audit records

12. <u>TOP-010-1(i)</u>

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 Realtime monitoring and Real-time Assessments. The Operating Process or Operating Procedure shall include:

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:

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:

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;

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 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.

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.

3. DESCRIBE ANY CONSIDERATION OF THE USE OF IMPROVED INFORMATION TECHNOLOGY TO REDUCE THE BURDEN AND TECHNICAL OR LEGAL OBSTACLES TO REDUCING BURDEN

The use of current or improved technology is not covered in Reliability Standards and is therefore left to the discretion of each reporting entity. We think that nearly all of the respondents are likely to make and keep related records in an electronic format. Each of the six Regional Entities has a well-established compliance portal for registered entities to electronically submit compliance information and reports. The compliance portals allow documents developed by the registered entities to be attached and uploaded to the Regional Entity's portal. Compliance data can also be submitted by filling out data forms on the portals. These portals are accessible through an internet browser password protected user interface.

4. DESCRIBE EFFORTS TO IDENTIFY DUPLICATION AND SHOW SPECIFICALLY WHY ANY SIMILAR INFORMATION ALREADY AVAILABLE CANNOT BE USED OR MODIFIED FOR USE FOR THE PURPOSE(S) DESCRIBED IN INSTRUCTION NO. 2

The Commission periodically reviews filing requirements concurrent with OMB review or as the Commission deems necessary to eliminate duplicative filing and to minimize the filing burden. Reliability Standards are developed by a collaborative process which requires industry participation. The Commission is unaware of any other source of information similar to the additional requirements.

5. METHODS USED TO MINIMIZE THE BURDEN IN COLLECTION OF INFORMATION INVOLVING SMALL ENTITIES

In general, small entities may reduce their burden by taking part in a joint registration organization or a coordinated functional registration. These options allow an entity to share its compliance burden with other entities.

Detailed information regarding these options is available in NERC's Rules of Procedure at sections 507 and 508.[1]

6. CONSEQUENCE TO FEDERAL PROGRAM IF COLLECTION WERE CONDUCTED LESS FREQUENTLY

In general, information collection requirements in Reliability Standards and requirements help maintain Bulk-Power System reliability. The Commission believes that the elimination of unnecessary requirements will strengthen the Reliability Standards program and benefit overall reliability by allowing registered entities to focus their resources on complying with those Reliability Standard requirements that more effectively promote the reliability operation and planning of the nation's Bulk-Power System. The standard requires entities to report certain disturbance events within 24 hours of meeting an event type threshold or by the end of the next business day if the event occurs on a weekend. Other paperwork related requirements are one-time or done on a yearly basis. If the disturbance events were reported less frequently, it would undermine NERC's (and others') ability to mitigate the current event and prepare for a possible next event.

7. EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE INFORMATION COLLECTION

There are two special circumstances as described in 5 CFR 1320.5(d)(2) related to this information collection.

The data retention requirement in the Reliability Standards indicates that entities maintain data or evidence to show compliance with the requirements since the last audit. Reliability audits are generally every three years, but timing is such that they could be more than three years apart.

This is the language adopted by the standards drafting team and approved by industry representatives during the balloting process. As such, this is the data retention period deemed necessary for the reliability purposes contained in this standard.

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1 Details of the current ERO Reliability Standard processes are available on the NERC website at http://www.nerc.com/FilingsOrders/us/RuleOfProcedureDL/Appendix_3A_StandardProcessesManual_20130626.pdf.

The reporting requirements are event driven, and as such, an entity may be required to report more often than quarterly. NERC is responsible for ensuring the reliability of the bulk electric system. General statement.

Emergency electric incidents and disturbances leading to interruptions of power, such as rotating blackouts, could lead to disruptions of critical infrastructures. The national security, economic prosperity, and social wellbeing of the nation depends on the continuing reliability of our increasingly complex and interdependent infrastructures, the key one of which is electric power.

For these reasons we consider the reporting requirements necessary.

8. DESCRIBE EFFORTS TO CONSULT OUTSIDE THE AGENCY: SUMMARIZE PUBLIC COMMENTS AND THE AGENCY'S RESPONSE

The Commission published a 60-day notice[2] in Docket No. IC21-25 in the Federal Register requesting comments. No comments were received in response to the 60-day Notice.

In addition, the Commission is publishing a 30-day Notice in the Federal Register[3].

9. EXPLAIN ANY PAYMENT OR GIFTS TO RESPONDENTS

The Commission does not make payments or provide gifts for respondents related to this collection.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS

There are no specific assurances of confidentiality mentioned to respondents.

11. PROVIDE ADDITIONAL JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE

This collection does not include any questions of a sensitive nature.

12. ESTIMATED BURDEN OF COLLECTION OF INFORMATION

On February 19, 2021, NERC filed a petition seeking approval of proposed Reliability Standard FAC-008-5. NERC states that proposed Reliability Standard FAC-008-5 reflects the retirement of Requirement R7 of the currently effective standard. NERC notes that this proposal was recommended following the first phase of work under the NERC Standards Efficiency Review

2 86 FR 23954, May 5, 2021
3 86 FR 44014, August 11, 2021

and that in its Order No. 873 remanding a previously proposed version of the FAC-008 Reliability Standard, the Commission agreed that the retirement of Requirement R7 from the standard would not result in a reliability gap.

In June 2019, following the conclusion of the standard development process, NERC submitted a series of standard retirement proposals to the Commission. Among the proposals, NERC submitted for Commission approval proposed Reliability Standard FAC-008-4, in which NERC proposed to retire Requirements R7 and R8 of currently effective Reliability Standard FAC-008-3. In September 2020, the Commission issued Order No. 873 regarding NERC's retirement proposals. In this order, the Commission remanded proposed Reliability Standard FAC-008-4 to NERC for further consideration, citing concerns with the proposed retirement of Requirement R8 of the currently effective standard. The standard drafting team determined to develop a new version of the Reliability Standard, proposed Reliability Standard FAC-008-5, in which only Requirement R7 of the currently effective standard would be proposed for retirement. Reliability Standard FAC-008-5 Requirement R7 requires Generator Owners and Transmission Owners to provide certain information to requesting Reliability Coordinator(s), Planning Coordinator(s), Transmission Planner(s), Transmission Owner(s), and Transmission Operator(s) regarding their Facilities, as follows:

R7. Each Generator Owner shall provide Facility Ratings (for its solely and jointly owned Facilities that are existing Facilities, new Facilities, modifications to existing Facilities and re-ratings of existing Facilities) to its associated Reliability Coordinator(s), Planning Coordinator(s), Transmission Planner(s), Transmission Owner(s) and Transmission Operator(s) as scheduled by such requesting entities.

In the years since Reliability Standard FAC-008-5 was developed, NERC has developed other Reliability Standards that render the data provision obligations of Requirement R7 redundant., Requirement R1 of Reliability Standard TOP-003-3 – Operational Reliability Data requires the Transmission Operator to maintain a documented data specification (Requirement R1) and for the Transmission Owner and Generator Owner to provide the requested data (Requirement R5).

Estimate of Annual Burden[4]*:* The Commission estimates the burden and cost[5] for this information collection as follows.

4 Burden is defined as the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. For further explanation of what is included in the information collection burden, refer to 5 CFR Part 1320.

5 The Commission staff thinks that the average respondent for this collection is similarly situated to the Commission, in terms of salary plus benefits. Based on FERC's 2020 annual average of $172,329 (for salary plus benefits), the average hourly cost is $83/hour.

Proposed Changes to Burden Due to Docket No. RD21-4-000 Adjustments and Clarifications					
Reliability Standard & Requirements	**No. of Respondents & Type of Entity (1)**	**Annual No. of Responses per Respondent (2)**	**Annual No. of Responses (1)*(2)=(3)**	**Average Burden Hrs. Per Response (4)**	**Total Annual Burden Hours (3)*(4)=(5)**
RD21-4 Net Changes to FERC-725A, OMB Control No. 1902-0244					
FAC-008-05 (Facility Ratings)[6]	1,003 (No Change)	1	1,003 (No Change)	-10 hrs. (Reduction)	-10,030 hrs. (Reduction)

IC21-19-000 Renewal of 725A

The following table represents the current burden associated with all Mandatory Reliability Standards that fall under FERC-725A

Reliability Standard & Requirement	**Number of Entity[7]** (1)	**Number of Annual Responses Per Entity** (2)	**Total Number of Responses (1) *(2) = (3)**	**Average Number of Burden Hours per Response (4)**	**Total Burden Hours (3) *(4) = (5)**
FERC-725A					
Mandatory Reliability Standards for Bulk Power System	3,420	1	3,420	428.86 hrs.	1,466,716 hrs.
RD21-4 Net Changes	1,003 (No change)	1	1,003 (No Change)	-10 hrs.	-10,030 hrs. (Reduction)
Total for FERC-725A					1,456,686 hrs.

6 The type of entity effect is the NERC registered GO = Generator Owners (1,003). This reduction for 725A represent a decrease in burden but the GOs still have other obligations, so the 1,003 is included for information purpose but does not affect the overall number of entities in 725A.

7 This is a list of NERC registered entities who under 725A need to follow the NERC Standards. BA=Balancing Authority (99); DP = Distribution Provider (373); GP = Generator Owner (1,003); Generator Operator (937); PA/PC Planning Authority/Planning Coordinator (65); RC=Reliability Coordinator (11); RP = Resource Planner (160); RSG = Reserve Sharing Group (11); FRSG = Frequency Response Sharing Group (1); TO = Transmission Owner (321); TOP = Transmission Operator (167); TP = Transmission Provided (201); TSP = Transmission Service Provider (71); for a sum total of (3,420). The same entity may have multiple registration obligation to follow under 725A so an individual entity's obligation increases based on registration functions. These values were derived from the NERC Compliance data of February 5, 2021 using only unique United States registered entities.

Note: FAC-008-05 is a part of the Bulk Power System burden totals. The net changes for the responses and hours will affect the totals for the row stated "Mandatory Reliability Standards for Bulk Power System"
Expanded Table Showing the Mandatory Reliability Standards for Bulk Power System is provided below (The hyperlinks highlighted in blue provide additional information on the individual standards (Requirements, Measurements, and most recent order):

Standard	Name	In-service
FAC-008-5	**Facility Ratings**	**1/1/2013**
INT-006-5	**Evaluation of Interchange Transactions**	**4/1/2021**
INT-009-3	**Implementation of Interchange**	**4/1/2021**
PER-003-2	**Operating Personnel Credentials**	**7/1/2019**
PRC-008-0	**Implementation and Documentation of Underfrequency Load Shedding Equipment Maintenance Program**	**6/18/2007**
PRC-011-0	**Undervoltage Load Shedding System Maintenance and Testing**	**6/18/2007**
PRC-017-1	**Remedial Action Scheme Maintenance and Testing**	**4/1/2017**
PRC-018-1	**Disturbance Monitoring Equipment Installation and Data Reporting**	**6/18/2007**
TOP-001-5	**Transmission Operations**	**4/1/2021**
TOP-002-4	**Operations Planning**	**4/1/2017**
TOP-003-4	**Operational Reliability Data**	**4/1/2021**
TOP-010-1(i)	**Real-time Reliability Monitoring and Analysis Capabilities**	**4/1/2018**

The existing burden inventory for the entire FERC-725A collection is estimated at 1,456,686 burden hours. FERC-725A contains the information collection requirements for nearly all of the US wide Reliability Standards. The collection started in 2007 when FERC approved 83 Reliability Standards with an estimated 1,252,680 burden hours. Since that time, NERC has revised many of the original standards (as well as proposed new standards) resulting in many incremental additions to the total burden hours (a total

of approximately 575,000 burden hours). One of the most notable additions occurred in 2011(ICR # 201012-1902-005) when we closely evaluated the number of respondents and found that there were approximately 500 more than we previously estimated. This adjustment increased the total burden for the FERC-725A by approximately 450,000 hours.

13. ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS

There is no start-up or other non-labor hour cost associated with this collection.

14. ESTIMATED ANNUALIZED COST TO FEDERAL GOVERNMENT

The estimate of the cost for 'analysis and processing of filings'[8] is based on salaries and benefits for professional and clerical support. This estimated cost represents staff analysis, decision-making, and review of any actual filings submitted in response to the information collection.

The Paperwork Reduction Act (PRA) Administrative Cost is the average annual FERC cost associated with preparing, issuing, and submitting materials necessary to comply with the PRA for rulemakings, orders, or any other vehicle used to create, modify, extend, or discontinue an information collection. It also includes the cost of publishing the necessary notices in the Federal Register.

	Number of Employees (FTEs)	**Estimated Annual Federal Cost**
Analysis and Processing of filings	0	$0
PRA Administrative Cost		$6,475
FERC Total		$6,475

15. REASONS FOR CHANGES IN BURDEN INCLUDING THE NEED FOR ANY INCREASE

The net changes for RD21-4, retirement of Ry7 created a reduction in the (-10,030) hours and will affect the totals for the row stated, "Mandatory Reliability Standards for Bulk Power System". Any further adjustments in the total are due to fluctuations in industry and corrections of the estimates.

FERC-725A	**Total Request**	**Previously Approved**	**Change due to Adjustment in Estimate**	**Change Due to Agency Discretion**

8 The estimate uses the FERC's FY 2020 average annual salary plus benefits of one FERC FTE (full-time equivalent [$172,329 per year or $83.00 per hour]).

Annual Number of Responses	3,420	2,466	954	0
Annual Time Burden (Hr.)	1,456,686	1,466,716	0	-10,030
Annual Cost Burden ($)	156,953	126,725	30,228	0

16. TIME SCHEDULE FOR PUBLICATION OF DATA

There are no data publications as part of this collection

17. DISPLAY OF EXPIRATION DATE

It is not appropriate to display the expiration date because the information is not collected on a preformatted form or is part of a Reliability Standard, which do not display OMB expiration dates.

18. EXCEPTIONS TO THE CERTIFICATION STATEMENT

The Commission does not use statistical methods for this collection. Therefore, the Commission does not certify that the collection uses statistical methods.