

Agenda Item 3 SOTC Meeting February 8, 2012

Information Technology Update

Standards Oversight and Technology Committee Meeting Marvin Santerfeit, Director of Information Technology and Services February 8, 2012





Agenda

NERC Technology Update

- Key Accomplishments
 - Princeton to Atlanta Data Center
 - Washington DC office
 - Public-facing website
- NERC Information Technology Architecture Study
 - Key findings
 - Recommendations
- ERO Project Management Office Update
 - Accomplishments to date
 - Next steps



- Princeton to Atlanta Data Center move 95% complete
- Washington DC new office completed on December 16, 2011
- Help Desk single point of contact (SPOC) established and implemented
- Implemented new Intranet site using SharePoint
- NERC public-facing website assessment completed
- Established NERC Information Technology Advisory Group (ITAG)
- Completed assessment of purchasing process for Microsoft licenses

- AN ELECTRIC ORPORATION NERC IT Architecture (ITA) Study
- Deloitte & Touche completed an ITA study for NERC from November 11, 2011 through January 23, 2012
- Key findings:
 - NERC Information Technology infrastructure follow best practices for redundancy and stability
 - NERC application review suggested consolidation of applications and data
 - NERC Information Technology must work to align services with best practices
 - Several resource enhancements are required to build organizational structure aligned with ERO requirements
 - NERC and the ERO Regional organizations must work together to align strategic application needs in order to maximize effectiveness



Project Management Office Upd<u>ate</u>

- PMO staffed with three (3) resources
- Compliance Reporting and Tracking System (CRATS) identified as priority #1 by ERO EMG
- Business requirements effort underway to document CRATS Enforcement process steps
 - Next Steps In collaboration with the ITSG develop agreed upon:
 - Vendor criteria
 - ERO processes for data submission, security, policies and reporting
 - ERO processes for application acceptance testing, deployment and enhancement
 - Extranet site for ERO visibility to project status



Transition the Interchange Distribution Calculator (IDC) to the Industry Consortium

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RELIABILITY | ACCOUNTABILITY



- NERC, Eastern RC entities, and OATI working transition
- Costs associated with the IDC collected as part of the NERC assessments from the Load Serving Entities (LSEs) in the Eastern Interconnection
- Present prospective members of consortium are the users of the IDC—not all of the Eastern Interconnection RC organizations



- Finalize and execute the consortium agreement (2Q2012)
- Establish Steering Committee and begin operations (3Q2012)
- File and obtain FERC approval of the billing arrangement (2012)
- Change reporting relationship of the IDC Working Group to the Steering Committee (4Q2012)
- Commencement of new IDC contract (May 2013)



Reliability Standards

Standards Oversight and Technology Committee Meeting Herb Schrayshuen, Vice President Standards and Training February 8, 2012



RELIABILITY | ACCOUNTABILITY



- Request for discussion and possible policy guidance for the following projects:
 - Project 2010-07 Generator Requirements at the Transmission Interface
 - Project 2009-22 Interpretation of COM-002-2 for the ISO/RTO Council (IRC)



Generator Requirements at the Transmission Interface (GO/TO)

- GO/TO Ad Hoc Report
 - Recommended changes to requirements:
 - 32 requirements add Generator Interconnection Facility to requirement
 - o 12 requirements in FAC-003-1
 - 2 requirements expand applicability to GO/GOP
 - o 8 new requirements
 - Recommended changes to definitions



Standards Drafting Team (SDT) Opinion

- Assigning TO/TOP such responsibilities to GOs and GOPs would:
 - Require significant training for tasks
 - Require substantially more data and modeling responsibilities
 - Detract from the entities' primary functions to operate in a reliable manner
- SDT approached the gap in reliability differently than the Ad Hoc Task Force
- SDT recommended changes to Standards:
 - FAC-001, FAC-003, PRC-004, and PRC-005 future work



• SDT concluded:

- Certain requirements are covered by other standards
- Certain requirements will be addressed by standards to be revised or made applicable in the future
- Modifying certain standards is not in the scope of the SDT
- Following changes sufficiently address issues in original scope:
 - Changes proposed for FAC-001 and PRC-004 are currently pending Board of Trustees approval
 - Future changes to FAC-003 and PRC-005 are planned
 - A Compliance Application Notice (CAN)for PRC-001-1



Consideration of Standards

Standard	Ad Hoc Report	FERC Orders	NERC Draft Directive	SDT Opinion
EOP-003	Х			Covered by PRC-001
EOP-005			Х	Scope Expansion
FAC-001			Х	Made applicable to GO
FAC-003	Х	Х	Х	Made applicable to GO
FAC-014		Х	Х	Covered by FAC-008
IRO-005	Х			Covered by PRC-001
PER-001	Х			Covered by TOP-001
PER-002	Х		Х	Future Project
PER-003		Х		Scope Expansion



Standard	Ad Hoc Report	FERC Orders	NERC Draft Directive	SDT Opinion
PRC-001		Х	Х	Future CAN to address
PRC-004		Х	Х	Clarified gen. interconnection Facility inclusion
PRC-005		Х	Х	Clarified gen. interconnection Facility inclusion
TOP-001	Х	X	X	Covered by TOP-002/TOP- 003
TOP-004	Х	Х	Х	Covered by TOP-001/TOP- 002
TOP-006		Х	Х	Covered by PRC-001/FAC- 001
TOP-008	Х			Covered by TOP-001

NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION



- Should NERC staff hold off filing when future work, that would complete the regulatory package more fully, is pending?
- How best to resolve the question of whether the response of the SDT is complete?

AMERICAN ELECTRIC Interpretation of COM-002-2 for IRC

- October 1, 2009, clarification requested of Requirement R2 of COM-002-2 by the IRC
- Work on the interpretation initially delayed based on reprioritization of the total standards workload, and revision by the Standards Committee's process for addressing interpretations
- April 2011, the Standards Committee Interpretation Guidelines were approved
- Standards Committee initiated a plan to simultaneously address three part communication protocols through:
 - The interpretation of COM-002-2 as Project 2009-22
 - Project 2007-02 Operating Personnel Communications Protocols COM-003





- August 31, 2011-Standards Review Committee of the IRC submitted a Level 1 Appeal for Inaction related to Project 2009-22
 - Appeal of COM-002-2 Interpretation requested:
 - Project 2009-22 be given an "immediate/urgent" priority within 30 days of receiving the appeal
 - NERC to provide a formal explanation of the delays associated with the Project
 - In response to the time-frame required for an Appeal, the interpretation was moved forward separately from Project 2007-02





- Reliability concerns:
 - Interpretation, if enacted, will put Operators in the position of having to change communications approach during an emergency
 - The impact of miscommunication causing a mishap on the bulk power system does not differ whether it occurs during routine operations or during emergency operations
 - There have been events where the severity has been increased due to miscommunication
- Compliance concerns:
 - Creates an unnecessary level of confusion for registered entities and compliance auditors

NERC Operating Personnel Communications Reliability corporation Protocols (COM-003)

- Purpose of COM-003:
 - Require that real-time system operators use standardized communication protocols during normal and emergency operations to improve situational awareness and shorten response time.
- Project Schedule:
 - Initial Ballot—Late April/Early May
 - Successive Ballot—Late August/Early September
 - Recirculation Ballot—Early November
 - Board of Trustees approval in November 2012/February 2013 is possible, if no successive ballot is needed