

Reliability Standards Standing Committee (RSSC)

Minutes of Meeting #38

September 15th, 2017 | 9:30 AM – 3:00 PM | IESO's Boardroom, 120 Adelaide St. W., Toronto

Attendance

Participant Name	Company Name	Attendance Status
Abbas Munir	Bruce Power	Present
Ben Li	IESO	Present
Cristian Dragnea	IESO	Present
Constantin Chitescu	OPG	Present
Dan Kathir	IESO	Present
David Kiguel	<i>Observer</i>	Present
David Kwan	OPG	Present
Dennis Hall	Brookfield Renewable Power	Present
Geoff Saunders	Brighton Beach	Present (on the phone)
Hassib El Murdea	OPG	Present
Helen Lainis	IESO	Present
Jay Jayaraman	Enbridge	Present
Joel Charlebois	AESI	Present
Jon Veldhuizen	Northland Power Inc	Present
Kurtis Chong	IESO	Present
Laurie Reid	Ontario Energy Board	Present
Mike Yealland	MYCON Inc.	Present
Monica Adam	IESO	Present
Norm Dang	IESO	Present
Omar Doo	IESO	Present
Paul Malozewski	Hydro One	Present
Payam Farahbakhsh	Hydro One	Present
Ron J. Falsetti	AESI	Present
Scott Berry	IESO	Present
Shahid Khan	Northland Power Inc.	Present
Soon Chua	Portlands Energy Centre	Present
Tracy Brason	Brookfield Renewable Power	Present

Scribe: Griselda Matos

rssc@ieso.ca: Please report any corrections, additions or deletions to scribe.

All meeting materials are available on the IESO's RSSC webpage at:
<http://www.ieso.ca/en/sector-participants/engagement-initiatives/standing-committees/reliability-standards-standing-committee>

References:

IESO MACD page: <http://www.ieso.ca/en/sector-participants/market-oversight/rule-compliance/compliance-overview>

IESO Reliability Standards Compliance page: <http://www.ieso.ca/en/sector-participants/system-reliability/ontario-reliability-compliance-program>

NERC Standards page: <http://www.nerc.com/page.php?cid=2>

NPCC Regional Standards/Criteria page: <https://www.npcc.org/Standards/default.aspx>

FERC Electric page: <http://www.ferc.gov/industries/electric.asp>

Action Item Summary as of the 38 th Meeting			
#	Date	Action	Status
1	April 13, 2017	Scott Berry to schedule webinar regarding Applicability criteria for the next quarter	Open
2	September 15, 2017	Helen Lainis will talk to the Control Room and update Market Manual 11.1 regarding the 30 minute rule for notifications and how it relates to the Market Rules that says prompt.	Open
3	September 15, 2017	Helen Lainis will look into how to include elements from the information catalogue as an appendix to Market Manual 11.1	Open
4	September 15, 2017	Helen Lainis to send an invite to Constantin Chitescu from OPG to discuss comments for proposed regional standard PRC-002.	Open

1. Welcome and Introductions

The thirty-eighth RSSC meeting commenced at 9:30 a.m. with brief introductions by each participant.

2. Administrative Issues

- a) The agenda for the meeting was reviewed. NPCC A10 criteria discussion was added to NPCC updates by *D. Kiguel*.
- b) The minutes of the last (thirty seventh) RSSC meeting were reviewed page by page. *J. Jayaraman* brought up in 2b item 4 if the IESO still intends to do a webinar. Also *D. Kiguel* brought up corrections in item 2b (Bing not Ben). Motions to adopt the meeting minutes as final were made by *J. Jayaraman* and *R. Falsetti*.
- c) Webinar open item from last meeting will remain open. The webinar will be completed in the November to January timeframe.
- d) RSSC Roster updates: Changes to the members of the RSSC distribution list can be emailed to Scott Berry or orcp@ieso.ca. Changes will be made upon request. J. Charlebois from AESI was added and E. Giaouris from Hydro One was removed.

3. IESO's NPCC ICE Experience

H. Lainis from Compliance Assurance delivered a presentation regarding IESO's NPCC ICE Experience. She went through the NPCC Process for CMEP which includes the Inherent Risk Assessment (IRA) and Internal Control Evaluation (ICE) and gave examples of flowcharts and spreadsheets for BAL standards. NPCC is flexible of how a company wants to show its controls and provides templates. NPCC was great at providing feedback and giving examples and brought its auditors and ICE team. For the IESO, it was a great exercise from the SME and company perspective.

R. Falsetti asked if our experience was generic. All other ISOs had good experiences. They all have controls but just a matter of depicting them.

J. Charlebois asked if there is intent to introduce an ICE process to CMEP. The response was deferred to *C. Dragnea* of MACD who replied that MACD has decided to postpone the development of the ICE process and focus on the overall CMEP and the IRA process. *C. Dragnea* cautioned that ICE in Ontario may develop differently than it has in the NPCC region. *H. Lainis* offered to help MPs by sharing more of the IESO experience but it may not be applicable in Ontario once the MACD program has been finalized.

P. Malozewski raised the question of how much work did ICE take to complete. *H. Lainis* responded that it took about a year and four people working 60 percent.

P. Farahbakhsh from Hydro One asked how an IRA is done. Compliance Assurance provided answers to NPCC.

4. **Applicability Criteria (MM11.1) Update Risk Based CMEP Project Update**

H. Lainis provided an update to the Applicability Criteria. Changes to the process will be sent to the Change Management group and posted for comments. Market Participants will then have the opportunity to provide comments before it is posted live. It will be posted in late October to November 2017.

5. **2017 Reliability Standards Compliance Monitoring Plan Q3 Update**

M. Adam provided updates on the 2017 Reliability Standards Compliance Monitoring Plan. In terms of timeline, Q2 self-certifications were due in June, Q3 self-certifications were due in September and Q4 self-certifications will be sent in mid-October and will be due 45 days after they are issued. The self-certifications will have the RSAW associated with the reliability standard attached to the request. The RSAW is not mandatory, however MACD requires market participants to provide a narrative that describes how they comply with the standard. Every applicable standard has an RSAW. *M. Adam* indicated that the 2018 Compliance Monitoring Plan will be posted in December and will, most likely, follow the same timelines.

R. Falsetti provided a comment that the advantages of RSAW is that they provide some hints and let market participants know what to concentrate on.

MACD has reviewed all the Q2 2017 submissions and will communicate in the form of an email or letter to market participants if their submission is either complete or incomplete and will ask for additional information if necessary. This will be done by mid-November 2017.

K. Chong asked what the completion of review signifies. It signifies that the assessed evidence provided by the market participant either satisfies the requirement or it does not.

M. Adam shared some observations from Q2 for market participants to consider for future submissions. This included market participants not submitting an RSAW or a compliance narrative, having documents not signed, or having old documents while requirements have changed. *C. Dragnea* commented that 2017 was a year of learning with the CMP being introduced late last year. Next year should run smoother as market participants and the IESO become more comfortable with the process and the tool.

S. Berry made the comment that the tool is new and the amount of evidence submitted is a lot. Capacity has been increased from 10 MB to 20 MB. Market participants will have to submit all types of evidence as PDF files. *D. Kiguel* stated that switching excel files to PDF can be difficult depending on the amount of tabs. *C. Dragnea* suggested market participants to submit excel files directly via the IESO portal, to the MACD Compliance Monitoring collaboration community.

6. NERC Lessons Learned

S. Berry delivered a presentation regarding NERC Lessons Learned. Since January of 2017, there have been nine lessons learned. The link is provided in the presentation. Market Participants are encouraged to go through the NERC lessons learned and review those that apply to their function.

1. *Dispatched reduction in Generation Output Causes Frequency Deviation*

The input data was not good. The BA tools dispatched too much supply based on information there. It ended up sending inaccurate messages and when tried to correct itself, it corrected too much creating frequency deviations. There should be some way of manually intervening regardless of quantity. Also, the ramp rates of fast ramping resources should be registered.

2. *Generator Trip while performing frequency response*

There was a large frequency excursion and a coal plant was in position to provide help. The distributed control system was not reflected in control system in place. The lesson is if tuning is performed over time, control systems should be updated to reflect reality.

3. *Loss of wind turbines due to transient voltage disturbances on the bulk Transmission System*

The wind turbines are not able to ride through voltage disturbance for some reason or another. There were 6 voltage ride events. The wind contribution to supply was better than half. Interconnection trip and placed the area in the dark for a while – 826 MW. The message is wind generators should review that they have voltage ride through capability and need to communicate their capabilities. If they lack such capability, it needs to be reported.

Solar disturbance event will be presented at the next RSSC meeting.

7. The Art of Developing an RSAW

S. Berry presented a refresher on RSAW development. RSAWs are a useful tool to support the Compliance Monitoring Program.

The Reliability Standard Audit Worksheet (RSAW) is a guide that describes the types of evidence entities may use to demonstrate compliance and it provides helpful hints and clues. Market Participants still have to provide evidence unless it is not applicable to them.

D. Kiguel gave a historical context on RSAWs. When RSAWs were invented, they were confidential documents only for the auditors. There was a lot of discussion to make them public. In the past the RSAWs were developed way after its applicable standard was approved. Nowadays, RSAWs are developed when the standards are being developed.

B. Li suggested to Market Participants to avoid providing whole documents as evidence and to only specify which section is applicable.

K. Chong asked if there is any suggestion or guidance when two versions of RSAWs are available when covering period of the audit. Market Participants are instructed to provide the most recent version of the RSAW standard but it is within their rights to also provide the older version as well. It was suggested that

the RSAWs should be filled by the same SME and to understand the measures being used in that requirement.

C. *Dragnea* asked members to check the MACD audit manual for data retention requirements in Ontario.

8. Risk Based CMEP Project Update

C. *Dragnea* provided an update on the Risk Based CMEP Project. MACD is concentrating on the risk elements for Ontario and developing an IRA process. MACD has decided to postpone the development of the ICE process and reassess its implementation in the future.

IRA assessments will begin next year with the market participants identified as having BES elements. IRA assessments will involve meetings, discussions and they will be similar to an audit. Market participants must think of the risks inherent to them, the assets they own, how they operate and their compliance history. By the end of this year, the ON risk elements and the IRA process documents will be available to market participants.

Once the IRA for a market participant is assessed, MACD will define a set of standards to be monitored for that market participant and will send each market participant an individualized Compliance Monitoring Plan (CMP). Individual CMP plans will be carried out in 2019.

P. *Malozewski* asked if MACD has an updated schedule or process flow that shows a roadmap of this process. MACD only has the vision right now and has not formalized a plan around it, however a webinar will be scheduled for market participants where they can leave comments and suggestions. MACD will provide market participants with enough time to prepare.

B. *Li* commented that the way NPCC assesses the inherent risk of an entity might be quite different than how MACD will assess the inherent risk of market participants in ON. There may be different categories and degrees of detail in their assessment. In the IESO's case, the IRA took a total of three months to be performed. Most Regions have their IRA templates posted online and market participants can check to see for examples.

R. *Falsetti* commented that most entities understand what their risks are and have developed controls around them.

9. Standards Enforcement Dates Update/Roadmap

G. *Matos* presented an update to the Standards Enforcement Dates Roadmap.

10. Transmission System Code (TSC) Update

L. *Reid* provided an update on the Transmission System Code since the last meeting. The TSC working group managed to schedule another meeting and made changes to the language. One more meeting has been scheduled. The amendment to the Transmission code will be revised by the end of the year.

11. Current NERC/NPCC/FERC Activities

11a. Update on NERC Standards Committee Activities

B. Li provided updates on the NERC Standards Committee activities. Since the last meeting, there has been two meetings and two conference calls. The major items to report include:

- Standards posted in the second quarter and third quarter are the same as first quarter and will be reduced.
- The Standards committee selected a new chair (Andrew Gallo) and vice-chair (Amy Casascelli)
- The Reliability Standards Development Plan for 2018 has been posted for industry comments.
- The standards grading spreadsheet has been posted for industry comments – for each criteria look at requirement and standard.
 - Seven people will be grading the same standard and industry can comment on attributes.
 - NERC staff has made a proposal to move the Technical rationale and guidance section in standards to a Technical rationale document because participants use it incorrectly as compliance guidance and the only way to comply.
- Standards Committee Process Subcommittee (SCPS) is drafting a response to industry comments on revisions to Standard Processes Manual (SPM). Next posting will be in December. It also started a project to revise the periodic review template.
- Project Monitoring and Oversight Subcommittee (PMOS) is business as usual with projects on time or slightly delayed.

11b. NERC Standards Development

B. Li provided an update on the standards recently posted for comment/ballot.

- BAL-002 and BAL-003 SAR - Standard is being enforced but FERC is asking for more for Requirement 1
 - BAL-003 – to correct minor errors – could lead to FERC thinking about wind farms providing frequency response capability.
- Periodic review of PER and VAR Standards
 - Revise PER-003 to improve clarity. Our position is indifferent
 - PER-004-2 recommended to be retired as it is duplicated in others
 - VAR-001-4.1 and VAR-002-4 – there are no reliability gaps in these standards
- Alignment of terms with registration
 - IA, LSE and PSE entities do not need to register with NERC. There is a proposal to align all standards to have these three removed or replaced by something else
 - As a BA, the IESO has load forecast information but industry has more loads coming in. IESO would have no idea as information is submitted by LSEs.
 - INT standards have been cleaned up to remove these three entities
- CIP-012 Standards on Control Center Communication Network – FERC order directive to develop to ensure information exchanged between control centres be protected according to impact high medium or low. This would be a new standard
 - There are several issues to improve the clarity and structure of this standard

- Revision to PRC-025-1 standard only affects generator owners. To address certain protection issues.
 - Ballot was affirmative
 - Revisions were very technical. Some discrepancies between relay settings vs where the diagram was showing – issues required clarification
- Geomagnetic Disturbance (GMD) Standard TPL-007
 - FERC asked industry to modify event definition and to make clarification to requirements
 - This planning standard was supported by Ontario and R1 is already in place
 - Original standard had seven requirements but three more requirements have been added
 - Ontario’s main objection is how the imposition of an additional assessment mitigates the risk on reliability when there is no obligation to follow up on findings
 - Ontario stakeholders may ask for an OEB review to get a variance, a footnote or remand it back to NERC for it not to be in effect in Ontario.
- Revisions to TPL-001 Standard Addressing FERC Directives– it was approved but there is a concern about planned outages having an impact.
 - Planned outages less than six months can have a reliability impact and should be addressed and reflected in the base model.
 - *K. Chong* asked if a requirement can be remanded or does the whole standard have to be remanded.

11c. NPCC Directories and Criteria Development

D. Kiguel wanted to bring up that the working group TFCP is in process of reviewing A-10 criteria. They are talking of changing the classification of bulk power system elements and going to bright line classification. RSSC members will monitor the progress of this review.

12. Other Items

C. Chitescu from OPG raised issues and gaps with upcoming PRC-002 and NPCC Directory 12 being retired. *H. Lainis* will send him an invitation to discuss this further.

13. Next Meeting

The 39th RSSC meeting (Q4 for 2017) is scheduled for Friday, December 15, 2017 at 120 Adelaide Street West (downtown Toronto) or the viewing gallery at Clarkson (2635 Lakeshore Road W. Mississauga) if the room at Adelaide is not available.