



**RELIABILITY FIRST**

January 3, 2021

To: ReliabilityFirst Compliance Contacts  
Subject: RF Compliance Program Update Letter – January 2022



## **Align Update – 1/3/2022**

### **Q4 – 2021 FAC-003-4 Periodic Data Submittals Now Open in Align**

The Q4-2021 Periodic Data Submittal (PDS) have been posted and are now available for submittal in Align through January 20, 2022.

Please keep the following instructions in mind when submitting your responses for this PDS:

- It is advised that only one person complete the Qualifying Questions to prevent any potential conflict issues. Only a user whose name is listed in Align under Qualifying Questions is able to submit responses.
- Once a PDS has been posted in Align, it will open current Qualifying Questions only to PCC and ACC with Align Submitter roles. If a Registered Entity changes their PCC or ACC midstream, after the PDS is posted, they will not be able to submit the Qualifying Questions required to submit the PDS. Please make sure that any person responsible for this PDS has the proper credentials and permissions, as these cannot be easily corrected.
- For this PDS, we ask that, if FAC-003-4 is not applicable to your Entity, you complete an attestation in Align. The attestation must have a detailed description explaining why FAC-003-4 is NA. "Not applicable" or "we don't have any outages" responses will be denied, and you will have to repeat the process.
- Do not make multiple attestations for FAC-003-4.
- If you previously submitted an Attestation, we ask that you "reaffirm" it in January so all of our Entities can attest on an annual basis. This will help avoid Entity attesting and RF approving every quarter for FAC-003.
- If you have made any recent changes to the PCC and ACC, they must still be made in both CORES and CDMS. If they were not updated in the ERO Portal/CORES, then the changes will

not appear in Align. Please make sure that any additional changes are done well in advance of the PDS posting. **Remember, it takes 48 hours for Align permissions to become effective from the date access is approved by PCC or Entity Admin.**

### **NEW! Align Release 3 Update**

R3 core functionalities - including audit/spot-checks, scheduling/scoping and compliance investigations - have been developed, tested, and the development of training is near completion. R3 is expected to be adopted by the Regions in the Q2 2022 timeframe.

### **NEW! Align Release 4 Update**

R4 core functionalities - including Inherent Risk Assessment, Compliance Oversight Plans, Complaints and R3 Audit and Spot Check Enhancements - is currently going through development along with iterative user acceptance testing.

### **Resources**

In addition to the [RF Align page](#), the [NERC Align Project page](#) and [FAQ](#) document also contain helpful information. Self-service training resources provided for Registered Entity staff, including training videos and user guides, are available on the [NERC Training Site](#).

As always, stakeholders are welcome to send comments or questions to [AskAlign@nerc.net](mailto:AskAlign@nerc.net)



Registered Entities must continue to **make any necessary changes or updates to Compliance Contacts in CORES and also in the RF webCDMS system.** This will help ensure the data remains consistent in both systems. This process will remain in effect until further notice, or until the legacy Regional systems are fully decommissioned on a date yet to be determined.

### **NERC Reliability Standards Effective January 1, 2022**

- PRC-012-2 Remedial Action Schemes (Requirement R9)
- TPL-007-4 Transmission System Planned Performance for Geomagnetic Disturbance Events (Requirements R6, 6.1–6.4, R10, 10.1–10.4)

If the aforementioned Standard version is included in an active Coordinated Functional Registration (CFR) agreement, the CFR agreement must be updated to include the revised versions of the Standards and Requirements. Any changes or updates to existing CFR agreements must be made using the NERC CFR tool.

## **NEW! RF Presents Industry Webinar – Joint Review of Protection System Commissioning on January 24**

In April 2020, FERC, NERC and the Regional Entities initiated a joint review to assess certain Registered Entities' protection system testing and commissioning programs and procedures. In November 2021, a [report](#) was released that identified best practices and opportunities for improvements to reduce the risk of future misoperations. This webinar will debrief the report and share lessons learned from the review.

This webinar will be held **Monday, January 24, from 2:00 – 3:30 p.m. Eastern.** [Click here](#) for the agenda, WebEx dial-in information and further details. Registration is not required for this free event.

This webinar is especially relevant for Substation Electricians/Supervisors, Substation Field/Commissioning Engineers, Relay Technicians and Relay Engineers, Communications Engineers/Technicians, Company Trainers and Human Performance Specialists, as well as Entity compliance contacts.

## **NEW! Annual Entity Profile Questionnaire (EPQ) Update**

The Annual Refresh of all EPQ information in MKInsight (per the 2022 EPQ Schedule below) has been sent out to all MKInsight EPQ users and will end on January 31, 2022. The purpose of this exercise is to update any information which is no longer accurate or relevant.

The Annual Refresh includes a review and update (as necessary) of all previously submitted information by the Entity for all five EPQ Observations. For questions in which there are NO changes, there is no action required and they can remain "as is." Please log into MKInsight at <https://ams.rfirst.org> to complete and submit the EPQ Annual Refresh.

Upon completion, please remember to document changes or no changes made during the Annual Refresh within the "Revision History Table" located at the beginning of each observation. Also, remember to choose the "Update" button once any changes are made. If you are a Multi-Regional Registered Entity (MRRE) under Coordinated Oversight and RF is not the Lead Regional Entity (LRE),

this request is optional at this time. If you have any questions or concerns, you can contact RF at [entityprofile@first.org](mailto:entityprofile@first.org).

<b>2022 EPQ Schedule</b>		
<b>Quarter / Annual Refresh</b>	<b>Begin Date</b>	<b>End Date</b>
Annual Refresh – 2022	January 3, 2022	January 31, 2022
Quarterly Update - Q2 2022	April 4, 2022	April 25, 2022
Quarterly Update – Q3 2022	July 4, 2022	July 25, 2022

## **2021-2022 Winter Preparedness – Hot Topic**

Since winter weather has already begun in the Great Lakes region, we would like to share some important information pertaining to Cold Weather preparedness. In case you have not already seen or read these publications, here is a list of NERC training materials, resources and other miscellaneous reports pertaining to winter preparedness for your reference:

1. [ERO Enterprise CMEP Practice Guide – Cold Weather Preparedness v1.0](#) (*October 2021*)
2. [NERC Cold Weather Training Materials](#)
3. [RF Cold Weather Knowledge Center](#)
4. [NERC 2021-2022 Winter Reliability Assessment](#) (*November 2021*)
5. [FERC/ERO February 2021 Cold Weather Outages in Texas and South-Central US Report](#) (*November 2021*)
6. [PJM Manual 14D including Attachment N Cold Weather Preparation Guideline and Checklist](#)
7. [MISO Weatherizing Generating Units](#)



## Monthly Technical Talk with RF Call

The next Technical Talk with RF will be held on **Monday, January 10** from 2-3:30 p.m. EST, and the tentative agenda includes the following presentations:

### 2022 Tech Talk Kickoff and Keynote

Jeff Craig – Vice President Reliability & Risk, RF

- This presentation is especially relevant for organizational leaders, and anyone interested in understanding how RF partners with industry to preserve and enhance reliability, resilience and security with an emphasis on continuous improvement and operational excellence.

### Mental Wellness, Human Performance and the Impact on Reliability

Tanya Hickey – Senior Manager Health & Safety Strategies, Ontario Power Generation (OPG)

- During the RF Human Performance (HP) workshop in August 2021, we received a large volume of questions and interest in the presentation regarding OPG's Total Health Strategy. This Tech Talk revisits the strategy, identifies the business case model, and highlights successful results to date.
- This presentation is especially relevant for HR personnel, HP specialists, field supervisors and all levels of management that are interested in the impact of mental health on their workforce.

**For all Technical Talk with RF calls:** [WebEx dial-in details](#) will be posted on a monthly basis to the RF website. Please contact [Brian Thiry](#), Director, Entity Engagement, with any questions, suggestions or topics of interest for future calls. For dial-in information and more details, please read the announcement attached to this email. **Note: January's call was moved up one week due to the Dr. Martin Luther King Jr. holiday.**

### Compliance Guidance

NERC compiles Implementation Guidance and CMEP Practice Guides for specific Standards and Requirements, which can be found [here \(ERO Enterprise - Endorsed Implementation Guidance\)](#).

## Violations Reporting

As a reminder, any new violation of a Reliability Standard identified by a Registered Entity should be immediately self-reported to RF via the new Align system. Contact [Shirley Ortiz](#), Senior Paralegal, at (216) 503-0674 with any questions concerning self-reports.

## Align Support – ERO Help Desk Ticketing System

If users encounter any access or system problems with Align, CORES, or any of the other NERC applications, first and foremost, try to resolve the issues yourself by using any one of the many self-service resources, guides and videos NERC has made available to you at <https://training.nerc.net/>.

If you are unable to resolve the issue on your own, place a ticket using the NERC Helpdesk Ticket Submission System: <https://support.nerc.net>.

The ERO Help Desk Ticketing System (Footprints) is available to Registered Entity users 24/7 and is monitored by the Regions and NERC. We will do our best to address your questions, concerns or issues as promptly as possible during normal business hours.

## WebCDMS Support

Any issues or questions related to the webCDMS system should be directed to the OATI Help Desk. The Help Desk is available during normal business hours (7 a.m. to 7 p.m. CST) for non-emergencies and 24/7/365 for critical system emergencies. Contact the OATI [Help Desk](#) by email or at (763) 201-2020. (Any questions pertaining to compliance with the NERC Reliability Standards should be directed to RF, not the Help Desk.)

<b>2022 Upcoming Standards Subject to Future Enforcement</b>		
PRC-012-2 <b>EFFECTIVE NOW</b>	Remedial Action Schemes (Requirement R9)	January 1, 2022
TPL-007-4 <b>EFFECTIVE NOW</b>	Transmission System Planned Performance for Geomagnetic Disturbance Events (Requirements R6, 6.1–6.4, R10, 10.1–10.4)	January 1, 2022
CIP-012-1	Cyber Security – Communications between Control Centers	July 1, 2022

PRC-002-2	Disturbance Monitoring and Reporting Requirements (100% compliance for Requirements R2–R4, R6–R11)	July 1, 2022
CIP-005-7	Cyber Security — Electronic Security Perimeter(s)	October 1, 2022
CIP-010-4	Cyber Security — Configuration Change Management and Vulnerability Assessments	October 1, 2022
CIP-013-2	Cyber Security - Supply Chain Risk Management	October 1, 2022
PRC-024-3	Frequency and Voltage Protection Settings for Generating Resources	October 1, 2022

### 2023 Upcoming Standards Subject to Future Enforcement

TPL-007-4	Transmission System Planned Performance for Geomagnetic Disturbance (R3, R4,4.1, 4.1.1-4.1.2, 4.2, 4.3, 4.3.1, R8, 8.1, 8.1.1-8.1.2, 8.3, 8.3.1)	January 1, 2023
EOP-011-2	Emergency Preparedness and Operations	April 1, 2023
IRO-010-4	Reliability Coordinator Specification and Collection	April 1, 2023
TOP-003-5	Operational Reliability Data	April 1, 2023
TPL-001-5.1	Transmission System Planning Performance Requirements	July 1, 2023

Please refer to the [U.S. Effective Dates](#) page on the NERC website for additional detail.

### Data Submittals Due in January 2022

01/20/2022	GO, TO	FAC-003-4 - Transmission Vegetation Management: Q4, 2021 Vegetation Outage Report – <b>Align Data Submittal</b>
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### Data Submittals Due in February 2022 - None

## ERO Enterprise Periodic Data Submittals Schedule

### 2021 Consolidated ERO Enterprise Periodic Data Submittals Schedule

#### Background

The Compliance Enforcement Authority (CEA) requires Periodic Data Submittals in accordance with the schedule stated in the applicable Reliability Standards, as established by the CEA, or as-needed, in accordance with the NERC Rules of Procedure (RoP), Appendix 4C Section 3.6.

The registered entities must provide the required information to the CEA in the format and by the required date specified in the request. The CEA reviews the data submittal to determine compliance with the Reliability Standards and may request additional data and/or information if necessary. If the CEA's review of the data submittal indicates a potential noncompliance with a Reliability Standard requirement by the registered entity, the CEA performs a Preliminary Screen of the potential noncompliance in accordance with NERC RoP, Appendix 4C Section 3.8.

The purpose of this schedule is to provide registered entities a consistent list of required Reliability Standard Periodic Data Submittals throughout the Electric Reliability Organization (ERO) Enterprise. NERC and the Regional Entities (REs) may also request data or information under Sections 800 or 1600 of the NERC RoP; these data requests are not included on this schedule.

ERO Enterprise Data Submittal Schedule				
ERO-Wide Data Submittal Schedule				
Reliability Standard	Requirement(s)	Submit To	Submittal Frequency	Proposed Due Dates
BAL-003-2	R1	NERC	Annually	Per dates as detailed in BAL-003-2 Reliability Standard Attachment A's Timeline for Balancing Authority Frequency Response and Frequency Bias Setting Activities
EOP-004-4	R2	NERC	Per Standard	Event Driven
EOP-008-2	R8	RE	Per Standard	Within six calendar months of the date when the functionality is lost
FAC-003-4	C.1.4	RE	Quarterly	20 days after the end of the quarter
PRC-002-2	R12	RE	Per Standard	Within 90 calendar days of the discovery of a failure of the recording capability for the SER, FR or DDR data
PRC-023-4	R5	RE	Annually	At least once each calendar year, with no more than 15 months between reports



ERO Enterprise Data Submittal Schedule				
PRC-023-4	R6.2	RE	Per Standard	Within 30 calendar days of the establishment of the initial list and within 30 days of any changes to list
TPL-001-4	Multiple See Footnote 12	RE	Per Standard	After the PC or TP receives assurance from their applicable regulatory authorities or governing bodies responsible for electric service issues do not object to the use of Non-Consequential Load Loss under footnote 12. See Appendix A for additional details on the ERO process for the determination as described in Attachment 1 of TPL-001-4.
TPL-007-4	R7.4	RE	Per Standard	Within a timely manner following the identification of the responsible entity being unable to implement the CA within the timetable submitted for Part 7.3 and prior to the end date of the submitted timetable.
TPL-007-4	R11.4	RE	Per Standard	Within 1 year of completion of the supplemental GMD Vulnerability Assessment and in a timely manner after determining that the implementation of the CAP by the responsible entity will require an extension of the timetable submitted per R11.3.
RE-Specific Data Submittal Schedule				
Reliability Standard	Requirement(s)	Submit To	Submittal Frequency	Proposed Due Dates
BAL-001-TRE-2	R1	Texas RE	Per Standard	Within 14 calendar days after each Frequency Measurable Event.
BAL-001-TRE-2	R2.2	Texas RE	Per Standard	By the end of the month in which the Primary Frequency Response calculation results were completed.

## Changes from the 2020 Periodic Data Submittals Schedule

From 2020 to 2021, the following changes occurred to this consolidated ERO Enterprise Periodic Data Submittals Schedule<sup>1</sup>:

- 2 Standards became effective in 2020 that were not included in the 2020 Periodic Data Submittal Schedule but are applicable for this PDS schedule:
  - BAL-001-TRE-2 (Board adopted 2/6/2020; Effective Date 7/1/2020)
  - TPL-007-4 (Board adopted 2/6/2020; Effective Date 10/1/2020)
- 2 Standards will become inactive in 2020:

<sup>1</sup> Changes are as of posting date of PDS Schedule. Additional changes to this schedule to include new information regarding effective dates and inactive dates will be reviewed on a quarterly basis.

- PRC-006-NPCC-1 (Inactive Date 3/31/2020)
- PRC-016-1 (Inactive 12/31/2020)
- 2 Standards will become effective in 2021 but are not applicable for this PDS schedule:
  - CIP-008-6
  - PRC-012-2
- 1 Standard will become inactive in 2021 and has been removed from this schedule:
  - PRC-004-WECC-2 (Inactive Date 1/1/2021)

# Appendix A: TPL-001-4 Use of Footnote 12 for Non-Consequential Load Loss Review Process

## Background

This Electric Reliability Organization (ERO) Enterprise<sup>2</sup> TPL-001-4: Use of Footnote 12 for Non-Consequential Load Loss Review Process document addresses how ERO Enterprise staff will jointly review requests to utilize footnote 12 for Non-Consequential Load Loss under TPL-001-4 to determine whether it would cause any Adverse Reliability Impact in a timely, structured, and consistent manner.

NERC Compliance Assurance will maintain this document under existing ERO Enterprise processes. This document will be reviewed and updated by NERC Compliance Assurance, as needed.

## Definitions

For purposes of this process, the following capitalized terms will have the definitions set forth in the NERC Glossary of Terms. For ease of reference, the definitions of the following terms that are used in this process are also included below.

**Adverse Reliability Impact** – The impact of an event that results in frequency-related instability; unplanned tripping of load or generation; or uncontrolled separation or cascading outages that affects a widespread area of the Interconnection.

**Consequential Load Loss** – All Load that is no longer served by the Transmission system as a result of Transmission Facilities being removed from service by a Protection System operation designed to isolate the fault.

**Non-Consequential Load Loss** – Non-Interruptible Load loss that does not include: (1) Consequential Load Loss, (2) the response of voltage sensitive Load, or (3) Load that is disconnected from the System by end user equipment.

These additional capitalized terms are also used in this process and have the definitions set forth below.

**Affected Regional Entity (ARE)** – A Regional Entity, other than the Lead Regional Entity, in which the Multi-Region Registered Entity participating in coordinated oversight is registered for various NERC functional responsibilities.

**Compliance Enforcement Authority (CEA)** – NERC or the Regional Entity in their respective roles of monitoring and enforcing compliance with the NERC Reliability Standards.

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<sup>2</sup> The ERO Enterprise is comprised of NERC and the Regional Entities.

**Coordinated Oversight** – The agreed upon steps and activities that a Lead Regional Entity and Affected Regional Entity(ies) follow for coordinating activities associated with delegated functions (e.g., compliance and enforcement, system events, etc.) for Multi-Region Registered Entities that have been approved for participation in the Program.

**Lead Regional Entity (LRE)** – The Regional Entity selected by the Electric Reliability Organization (ERO) Enterprise to lead coordinated efforts related to oversight of a Multi-Region Registered Entity participating in the Program. When appropriate, the ERO Enterprise may designate more than one LRE. The designated LRE could be changed, as agreed upon by the ERO Enterprise. In the event of a change, the registered entity will be notified 60 days prior to the effective date of the change.

**Multi-Region Registered Entity (MRRE)** – For the purposes of this guide, a registered entity—or two or more registered entities that are corporate affiliates—performing bulk electric system (BES) functions in two or more Regional Entities that has been approved for coordinated functions and responsibilities by the ERO Enterprise. It is acknowledged there are other registered entities that are corporate affiliates and performing BES functions in two or more Regional Entities that are not included in the Program.

## Process Overview

If a Planning Coordinator (PC) or Transmission Planner (TP) (entity) has determined that the use of Non-Consequential Load Loss under Table 1, footnote 12 is needed as an element of a Corrective Action Plan in Year One of the Planning Assessment, then the entity must ensure that the applicable regulatory authorities or governing bodies responsible for retail electric service issues do not object to the use of Non-Consequential Load Loss under footnote 12, and then submit a request the ERO for a determination of whether there are any Adverse Reliability Impacts caused by the request to utilize footnote 12 for Non-Consequential Load Loss, if certain conditions are met as outlined in Attachment 1 of TPL-001-4.

Attachment 1 indicates that the applicable regulatory authorities or governing bodies responsible for electric service must object or not object to the use of non-consequential load loss prior to a final ERO review and determination if either:

1. The voltage level of the Contingency is greater than 300 kV:
  - a. The Contingency analyzed involves BES Elements at multiple System voltage levels, the lowest System voltage level of the element(s) removed for the analyzed Contingency determines the stated performance criteria regarding allowances for Non-Consequential Load Loss under footnote 12, or
  - b. For a non-generator step up transformer outage Contingency, the 300 kV limit applies to the low-side winding (excluding tertiary windings). For a generator or generator step up transformer outage Contingency, the 300 kV limit applies to the BES connected voltage (high-side of the Generator Step Up transformer)
2. The planned Non-Consequential Load Loss under footnote 12 is greater than or equal to 25 MW.

Once assurance has been received that the applicable regulatory authorities or governing bodies responsible for retail electric service issues do not object to the use of Non-Consequential Load Loss under footnote 12, the Planning Coordinator or Transmission Planner will submit a request to the ERO for a determination of whether there are any Adverse Reliability Impacts caused by the request to utilize footnote 12 for Non-Consequential Load Loss. The burden to provide a sufficient basis for why the use of Non-Consequential Load Loss under footnote 12 does not result in Adverse Reliability Impacts is on the submitting entity. It is the responsibility of the joint Regional Entity and NERC team to review the submission and make a determination of whether the entity has demonstrated that the use of Non-Consequential Load Loss under footnote 12 does not result in Adverse Reliability Impacts.

The steps outlined here should be followed to ensure a timely, structured, and consistent approach to determining whether any Adverse Reliability Impacts are caused by the request to utilize footnote 12 for Non-Consequential Load Loss.

The entity will work with the Regional Entity designated as its Compliance Enforcement Authority (CEA) as outlined in this process and shown in **Figure 1: Non-Consequential Load Loss Review Process Flow Chart**. For MRREs in Coordinated Oversight, the CEA for this process is the Lead Regional Entity (LRE). The LRE will coordinate with the Affected Regional Entity(ies) (ARE) and the ARE(s) may participate in the joint review as well.

### ***Step 1 – Registered Entity Submittal***

If a PC or TP has determined that the use of Non-Consequential Load Loss under footnote 12 is needed as an element of a Corrective Action Plan in Year One of the Planning Assessment and meets the criteria in Attachment 1 Section III.1 or III.2, and assurance has been received that the applicable regulatory authorities or governing bodies responsible for retail electric service issues do not object to the use of Non-Consequential Load Loss under footnote 12, then the entity will contact their Compliance Enforcement Authority (CEA) to coordinate submittal of the necessary information.

The entity shall submit the data requested in **Entity Submittal Template** to a secure site that will be established by the CEA. The CEA will acknowledge receipt of the submission in writing within 15 days and review that all information requested in the Entity Submittal Template is provided in the entity's submittal. If the submittal is incomplete, the CEA will inform the entity to resubmit and the process will restart. The CEA will notify NERC Compliance Assurance when acknowledging receipt of the submission.

The entity submitting the request may withdraw the request any time prior to the CEA communicating the final determination.

### ***Step 2 – ERO Enterprise Review***

The CEA and NERC will form an ERO Enterprise Review Panel (review panel) comprised of not less than four (4) total individuals from the Region and NERC. The review panel will perform a review of the submitted information and develop a preliminary determination of whether any Adverse Reliability Impacts are caused by the request to utilize footnote 12 for Non-Consequential Load Loss within 90 days

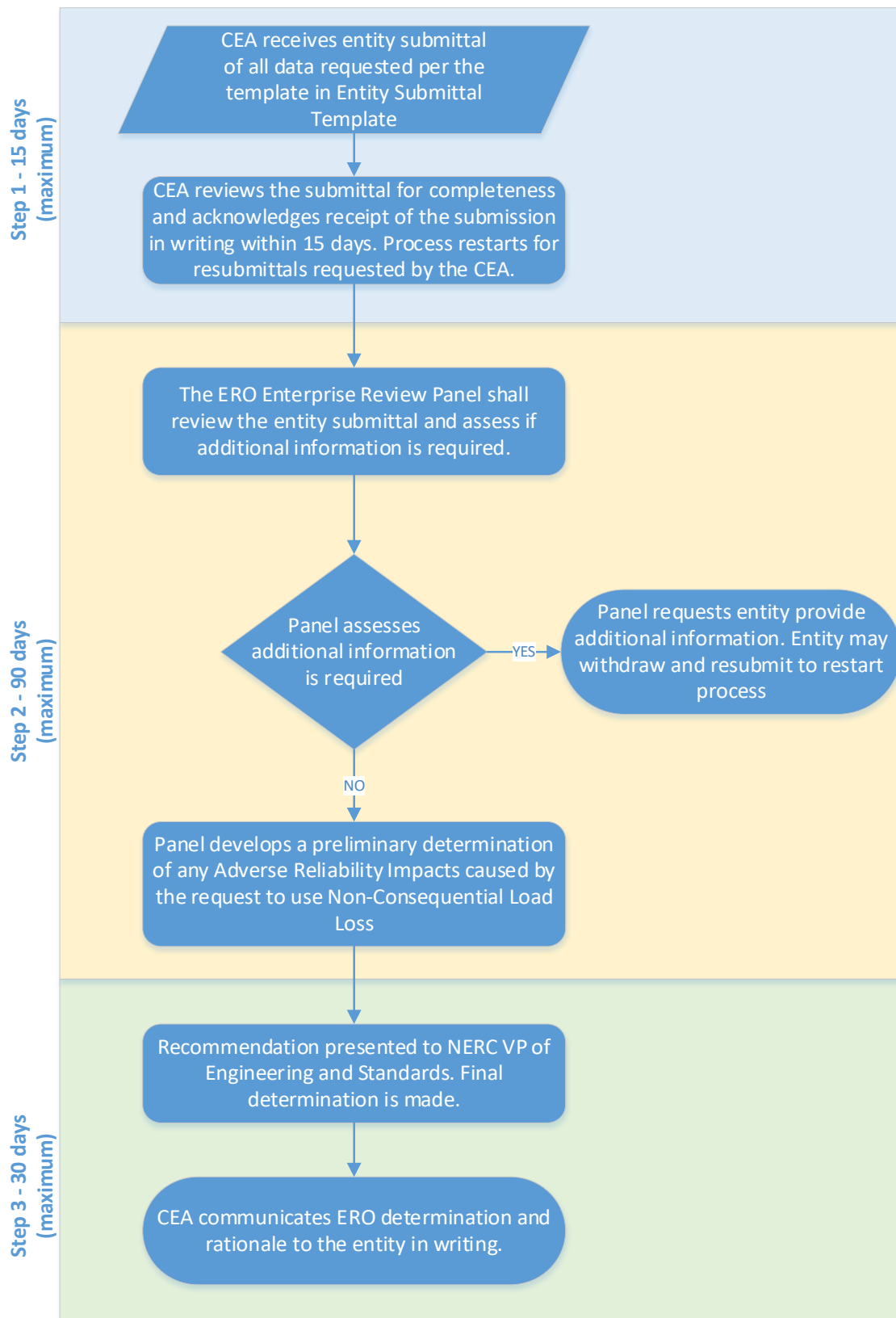
of its acknowledgement of the receipt of submission. During its review, the review panel may work through the CEA to request additional information from the entity submitting the request.

If the review panel determines it will be unable to complete its review within the established timeframe, the review panel, based on consultation with the managers of NERC Compliance Assurance and NERC Power System Analysis, will establish a revised timeline for completing its review. The revised timeline for review and determination will be provided to the entity by the CEA.

### ***Step 3 – ERO Determination***

The review panel will present to the NERC Vice President of Engineering and Standards for approval of the preliminary determination as the ERO determination. The review panel will communicate the ERO determination and rationale to NERC Compliance Assurance and the CEA.

The CEA will then communicate the ERO determination in writing to the entity along with the rationale for the determination within 30 days of NERC's Vice President of Engineering and Standards receiving the review panel's preliminary determination.



**Figure 1: Non-Consequential Load Loss Review Process Flow Chart**

## Entity Submittal Template

*Entity to provide the following information to the ERO. Answers to questions should be narratives with summarized technical rationales that are supported through documentation.*

<b>Entity name:</b>	
<b>NCR#:</b>	
<b>Primary entity contact name and information:</b>	
<b>Request submittal date:</b>	
<b>Coordinated Oversight Group # (if applicable):</b>	
<b>Regional Entities impacted (for MRREs only):</b>	

- Is the voltage level of the Contingency for which Non-Consequential Load Loss is an element of the Corrective Action Plan greater than 300 kV? (Yes/No)
  - If yes, does the Contingency analyzed involve BES Elements at multiple System voltage levels where the lowest System voltage level of the element(s) removed for the analyzed Contingency determines the stated performance criteria regarding allowances for Non-Consequential Load Loss under footnote 12? (Yes/No)
  - If yes, is it a non-generator step up transformer outage Contingency where the low-side winding (excluding tertiary windings) is 300 kV or greater? (Yes/No/N/A)
  - If yes, is it a generator or generator step up transformer outage Contingency where the BES connected voltage (high-side of the Generator Step Up transformer) is 300 kV or greater? (Yes/No/N/A)
- Is the planned Non-Consequential Load Loss under footnote 12 greater than or equal to 25 MW? (Yes/No)
- Assurance that has been received that the applicable regulatory authorities or governing bodies responsible for retail electric service issues do not object to the use of Non-Consequential Load Loss under footnote 12.
- Description of the submitting entity’s rationale for why its use of Non-Consequential Load Loss does not result in any Adverse Reliability Impacts.



- Conditions under which Non-Consequential Load Loss under footnote 12 would be necessary including:
  - System Load level and estimated annual hours of exposure at or above that Load level
  - Applicable Contingencies and the Facilities outside their applicable rating due to that Contingency
- Amount of Non-Consequential Load Loss with:
  - The estimated number and type of customers affected
  - An explanation of the effect of the use of Non-Consequential Load Loss under footnote 12 on the health, safety, and welfare of the community
- Estimated frequency of Non-Consequential Load Loss under footnote 12 based on historical performance.
- Expected duration of Non-Consequential Load Loss under footnote 12 based on historical performance.
- Future plans to alleviate the need for Non-Consequential Load Loss under footnote 12.
- Verification that TPL Reliability Standards performance requirements will be met following the application of footnote 12.
- Alternatives to Non-Consequential Load Loss considered and the rationale for not selecting those alternatives under footnote 12.
- Assessment of potential overlapping uses of footnote 12 including overlaps with adjacent Transmission Planners and Planning Coordinators.
- Supporting studies, study files, or other documents supporting the entity's answers to the above questions.

# Appendix B: TPL-007-4 CAP Extension Request Review Process

## Background

This Electric Reliability Organization (ERO) Enterprise TPL-007-4 Corrective Action Plan (CAP) Extension Review Process document addresses how ERO Enterprise Compliance Monitoring and Enforcement staff (CMEP staff) will jointly review requests for extensions to CAPs developed under TPL-007-4 to ensure a timely, structured and consistent approach to CAP extension request submittals and processing.

NERC Compliance Assurance will maintain this document under existing ERO Enterprise processes. This document will be reviewed and updated by NERC Compliance Assurance, as needed.

## Process Overview

If a registered entity (entity) has determined that a Corrective Action Plan (CAP) developed in accordance with TPL-007-4 Requirements R7 or R11 cannot meet the timetable provided per R7 Part 7.3 or R11 Part 11.3 due to situations beyond the control of the responsible entity, then the entity will submit an extension request to the ERO Enterprise for approval prior to the original required CAP completion date.

The steps outlined here should be followed to ensure a timely, structured, and consistent approach to extension request submittals and processing.

The entity will work with the Regional Entity designated as its CEA as outlined in this process. The entity submitting the extension request will be referred to as the 'submitting entity' and may represent only itself or multiple registered entities who have developed a joint extension request. The submitting entity is responsible for ensuring all registered entities who are jointly submitting the extension request are listed in the requested information below and for distributing any communications from its CEA to the other entities that are part of the joint extension request. If a joint extension request is submitted for multiple registered entities who have different Regional Entities designated as the CEA, the submitting entity's CEA will perform the steps outlined in this process and will be responsible for coordinating with the Regional Entity(ies) that are the designated CEA for the additional entities party to the joint extension request.

For entities in Coordinated Oversight, the CEA for this process is the Lead Regional Entity (LRE). The LRE will coordinate with the Affected Regional Entity(ies) (ARE) and the AREs may participate in the joint review as well.

### Step 1 – Registered Entity Submittal

If an entity determines that it cannot meet the required timetable for completing a CAP, the submitting entity will contact their CEA to coordinate submittal of an extension request. The submitting entity will submit the request to their CEA using the template provided in Appendix B: Entity Submittal Template.

Entities are encouraged to submit the extension request as soon as they are aware they will not meet the CAP completion date but no later than 60 days before the original required completion date to allow the CEA and NERC time to approve the extension request before the original required completion date.

If CAP extension requests are submitted less than 60 days before the original required completion date, the CEA and NERC may not have sufficient time to review the extension request before the required completion date. This could cause the entity not to meet its obligations under TPL-007-4 R7 Part 7.3 and R11 Part 11.3. It is the submitting entity's responsibility to ensure that all information detailed in TPL-007-4 Part 7.4 or 11.4 and requested in the Entity Submittal Template is provided in the entity's extension request submittal to facilitate the CEA and NERC review.

### **Step 2 – ERO Enterprise Review**

The CEA will acknowledge receipt of the submission in writing within 15 days and review that all information detailed in TPL-007-4 R7 Part 7.4 or R11 Part 11.4 and requested in the Entity Submittal Template is provided in the submitting entity's extension request submittal. The CEA will work with the submitting entity to provide any missing information and will notify NERC of the extension request submittal when acknowledging receipt of the submission.

CMEP staff from the CEA and NERC will then perform a joint review of (1) the situation(s) beyond the control of the entity preventing implementation of the CAP within the identified timetable; and (2) the revisions to the CAP and updated timetable for implementing the selected actions. Any additional information requested to support the extension request review will be coordinated with the submitting entity by the CEA. The CEA and NERC will complete the review within 45 days or provide notification to the submitting entity that it extending the time needed for review.

The Standard language states that an entity will submit an extension request for a full or partial delay in the implementation of the CAP within the timetable provided in TPL-007-4 R7 Part 7.3 or R11 Part 11.3. The determination whether to approve the extension request will be based on the specific facts and circumstances provided as to how the situations causing the delay in completing the CAP are beyond the control of the entity.

Examples of situations beyond the control of the responsible entity include, but are not limited to:

- Delays resulting from regulatory/legal processes, such as permitting;
- Delays resulting from stakeholder processes required by tariff;
- Delays resulting from equipment lead times; or
- Delays resulting from the inability to acquire necessary Right-of-Way.

Due diligence to order equipment, plan Right-of-Ways, obtain permits, etc., will be considered as part of the determination of whether a particular set of facts and circumstances constitute situations beyond the control of the entity. Additionally, cost may be a factor in whether a particular set of facts and circumstances constitute situations that are beyond the control of the entity. However, the cost of mitigation alone is not likely to be determined to be a situation that is beyond the control of the entity.

### **Step 3 – Registered Entity Notification**

The CEA will communicate the approval or denial of the extension request or continuation of the time needed to review the extension request in writing to the submitting entity including the rationale for the determination. For any continuation of the review, the CEA will also provide the submitting entity a revised timeline for when the determination will be provided.

### **Entity Submittal Template**

*Entity to provide the following information to the ERO. Answers to questions should be narratives with summarized technical rationales that are supported through documentation.*

Submitting entity name:

Submitting entity NCR#:

Submitting entity contact name and information:

Coordinated Oversight Group # (if applicable):

Regional Entities impacted (for MRREs only):

Is this extension request being submitted jointly with another entity? If yes, please provide:

1. NCR#'s for addition entity(ies):
2. Regional Entity that is the CEA for additional entity(ies):

Start date of CAP:

Original completion date of CAP:

Description of system deficiencies identified and selected actions to achieve required System performance per TPL-007-4 Part 7.1:

Circumstances causing the delay for fully or partially implementing the selected actions:

Explanation for why circumstances causing the delay are beyond the entity's control:

Description of revisions to the selected actions, if applicable:

New proposed completion date of CAP:

## Revision History

Version	Date	Revision Details
5.1	01/14/21	Errata: missing hyphen and incorrect reference for template – page 11
5.0	10/26/20	Added TPL-007-4 CAP Extension Request Review Process as Appendix B
4.0	10/21/20	-Changed proposed due date details for BAL-003-2; previous details were based on previous version of Standard. -Minor formatting
3.0	10/19/20	-Clarified language in describing changes from the 2020 PDS Schedule -Added new Footnote 1 to inform of potential changes to the PDS Schedule
2.0	10/15/20	-Remove BAL-003-1.1 due to retirement and added BAL-003-2 following approval of Standard.
1.0	09/28/20	-Initial Version – Updated from 2020 ERO Enterprise PDS Submittal Schedule