



Dates & Events

August 2015

- 18 Comments due to NERC on [draft 2016-2018 Reliability Standards Development Plan](#)
- 20 NERC Webinar – [Workforce Capability](#)
- 24 Comments due to FERC on [TOP-IRO standards proposed rule](#)
- 24 Comments due to FERC on [EOP and PRC standards proposed rule](#)
- 25 NERC 2015 [Reliability Leadership Summit](#), Washington, DC
- 27 NERC Webinar on [State of Standards](#)

September 2015

- 1-3 CIP v5 [Small Group Advisory Session](#), Atlanta, GA
- 3 NERC webinar, [Winter Preparation for Severe Cold Weather](#)
- 17 NERC webinar, [Long Term Planning and System Analysis](#)
- 29-30 [Monitoring and Situational Awareness Technical Conference](#), Austin, TX

Electric Reliability Update

AUGUST 14, 2015

FERC

FERC Issues Order on Grid Assurance Spare Equipment Service - August 7 – FERC issued an [order](#) approving a June 9 Grid Assurance LLC petition for declaratory order requesting certain declarations relating to a spare transmission equipment service that Grid Assurance intends to offer to transmission owners to support grid resiliency. Specifically, FERC issued declarations that (1) contracting with Grid Assurance for access to spare critical transmission equipment is a permissible resiliency element of a physical security plan under Requirement 5 of Reliability Standard CIP-014-1, and (2) prior authorization under the Federal Power Act is not required for sales or purchases from Grid Assurance of spare transmission equipment that is not in service at the time it is transferred.

FERC Accepts NERC Supplemental Filing - August 6 - In a [letter order](#), FERC accepted NERC’s report of comparisons of budgeted to actual costs for 2014 for NERC and its Regional Entities.

Coordination on Implementation of the Clean Power Plan - August 3 - [FERC, EPA, and DOE issued a document](#) describing the efforts being made between the three agencies to ensure continued electric reliability during the implementation of the Clean Power Plan (CPP), regulating carbon dioxide emissions from existing power plants. The agencies will make reasonable efforts to monitor the development and implementation of state CPP compliance plans and ensure coordination where reliability issues arise. See [Van Ness Feldman’s alert](#) on the final Clean Power Plan rule for more information.

NERC

NERC Answers Protests and Comments on Proposed Revised Regional Delegation Agreements - August 10 – NERC [filed an answer](#) to a protest of the American Public Power Association and comments of several transmission owners and operators on NERC’s request for approval of revisions to the *pro forma* Regional Delegation Agreement (RDA) as well as the eight individual RDAs with the Regional Entities. NERC requested that FERC deny the protest and approve the proposed revised *pro forma* RDA and the revised individual RDAs, to be effective January 1, 2016.

NERC Posts Revised Rules of Procedure – August 7 - NERC posted a [revised version](#) of its Rules of Procedure, which cover all NERC operations as the FERC-certified electric reliability organization (“ERO”). NERC revised Section 317 of the Rules of Procedure relating to review of Reliability Standards, moving from reviews every five years to a “periodic” review.

NERC Issues Statement on Clean Power Plan Finalization - August 3 - [NERC issued a statement on the Environmental Protection Agency’s Clean Power Plan rule](#) (CPP), noting that the final rule reflected changes identified in two NERC special reliability assessments of the CPP. NERC is planning a third CPP assessment, expected by the second quarter of 2016.

NERC Penalty Activity - July 30 - NERC [filed with FERC](#) a spreadsheet notice of penalty resolving 26 violations of 6 Reliability Standards.

NERC Submits Comments on Proposed TPL Reliability Standards - July 27 - NERC [submitted comments](#) supporting FERC’s proposal to approve Reliability Standard TPL-007-1 ((Transmission System Planned Performance for Geomagnetic Disturbance Events). NERC’s comments cover issues including the benchmark GMD event definition, transformer thermal impact assessment, installation of GMD monitoring devices, corrective action plan deadlines, minimization of load loss and curtailment, and the implementation plan.

NERC Balloting & Comment Deadlines

August 2015

- 17 [Comments Due](#): Project 2009-02 – Real-time Monitoring and Analysis Capabilities
- 19 [Comments Due](#): Project 2015-08– Emergency Operations
- 20 [Additional Ballot and Non-binding Polls and Comments Due](#): Project 2010-14.1 – Phase 1 of Balancing Authority Reliability-based Controls – BAL-002-2

September 2015

- 11 [Additional Ballot and Non-binding Polls and Comments Due](#): 2007-06 - System Protection Coordination - PRC-027-1
- 11 [Initial Ballot and Non-binding Polls and Comments Due](#): Project 2007-06.2 - Phase 2 of System Protection Coordination - TOP-009-1
- 14 [Initial Ballot and Non-binding Polls and Comments Due](#): Project 2010-14.2.1 - Phase 2 of Balancing Authority Reliability-based Controls - BAL-005-1, BAL-006-3, FAC-001-3
- 16 [Initial Ballot and Non-binding Polls and Comments Due](#): Project 2007-17.4 - PRC-005 FERC Order No. 803 Directive - PRC-005-6
- 18 [Initial Ballot and Non-binding Polls and Comments Due](#): Project 2010-04.1 - MOD-031 FERC Order No. 804 Directives - MOD-031-2

Regional Developments

Peak Reliability Completes Key Funding Agreement - August 7 - Peak Reliability [reached a major funding milestone](#) under the Reliability Coordinator Funding Agreement by securing executed Agreements representing 90% of net energy for load in the US portion of the Western Interconnection. Peak will now be funded under the Funding Agreement, and will notify FERC that it will not seek Section 215 funding for 2016.

WECC Releases 2015 Operational Practices Survey Report - July 17 - The Western Electricity Coordinating Council (WECC) [released a report](#) detailing the survey responses from its 2015 Operational Practices Survey, in which it questioned registered entities regarding Next-Day Studies, Seasonal Studies, Situational Awareness, Protection System, and Other Questions. WECC uses the Report to facilitate industry discussion and share operational best practices.

About Us

The Van Ness Feldman Electric Reliability Update is published by [Andrew Art](#), [Malcolm McLellan](#) and [Gabe Tabak](#), with assistance from [Ian Gutherz](#) and [Van Smith](#). [Van Ness Feldman](#) counsels, advises and trains a wide range of clients on reliability matters. Please [email us](#) or call us at 202.298.1817 or 206.829.1814 for additional information. Click [here](#) to sign up for the Reliability Update.

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Selected Regional Compliance / Training Events

September 2015

- 1 [RFC Protection System Training for Field Personnel](#)
- 9-10 [WECC CIP Advanced Training](#)
- 28-29 [SERC CIP Compliance Seminar](#)
- 30-10/1 [SPP Quarterly Compliance Forum](#)