

Reliability Standards and Compliance Subcommittee

WebEx and Meeting

May 14, 2015

10:00 am to 10:55 12:00 pm EPT, Valley Forge

Mr. Moleski reminded the Subcommittee that the WebEx's are now recorded for the convenience of the Members who could not make the meeting. No objections were raised.

Administration (10:00-10:15)

1) Call to Order / Role Call (Mr. Moleski)

Subcommittee Members:

Thomas Moleski, Secretary

Hugh Conley

Elizabeth Davis

Coleen Doll

Daniel Duff *

Claudine Fritz

David Fusek

Mike Grimes

Stacey Harman

Sandra Hopkins (ES)

Doug Jerzycke

Christy Koncz

Joyce Leya

John Loftis

Connie Lowe

Laura Lumbrazo

Jeffrey Mueller

Stephanie Rhoads

Sherri Rhodes

Joe Roettker

John Seelke

Angela Thomas

David Thorne

David Vicini

* In Person

Sr. Compliance Specialist, NERC and Regional Coordination

Duquesne Light Company

PPL EnergyPlus, L.L.C.

PECO Energy Company

Liberty Electric Power, LLC

PECO Energy Company

Appalachian Power Company (IM Dedicated)

EDP Renewables North America, LLC

Baltimore Gas and Electric Company

Dominion Virginia Power

Exelon Generation Co., LLC

Public Service Electric & Gas Company

Duquesne Light Company

Virginia Electric & Power Company

Dominion Virginia Power

Rockland Electric Company

Public Service Electric & Gas Company

PPL Electric Utilities Corp. dba PPL Utilities (TO)

FirstEnergy Corporation

Duke Energy Ohio, Inc.

Public Service Electric & Gas Company

Northern Virginia Electric Cooperative

Potomac Electric Power Company

PPL EnergyPlus, L.L.C.

PJM Staff:

Albert DiCaprio

Michael Herman

Mark Kuras

Stephanie Monzon

Senior Strategist, NERC and Regional Coordination

Sr. Engineer, Transmission Planning

Sr. Lead Engineer, NERC and Regional Coordination.

Manager, CIP Compliance

2) Review of Administrative Documents (Mr. Moleski)

- A. Antitrust Guidelines
- B. Code of Conduct
- C. Compliance Disclaimer
- D. Media Statement

There were no questions on the Administrative Documents

3) Approval of Agenda (Mr. Moleski)

The Agenda was approved as presented.

4) Approval of the April Meeting Minutes (Mr. Moleski)

The April meeting minutes were approved as presented

PJM Compliance Activities (10:15-11:00)

5) Manual Updates (Mr. Moleski)

- a) There are no PJM Manuals with updates having compliance implications

6) Compliance Bulletin 18 update - NERC Standards CIP-002-5.1

- a) Ms. Monzon informed the Subcommittee that all references to CIP-014 have been removed from CB018. Feedback received from the membership was that having two very similar subjects covered in the same document was confusing. CIP-014 information is now covered under CB020.
- b) None of the information on CIP-002 that was reviewed with the Subcommittee last month has changed.
- c) PJM is working on finalizing this document

7) Compliance Bulletin 19 update - CIP Assessment of Phasor Measurement Units and Synchrophasor Infrastructure

- a) Ms. Monzon informed the Subcommittee that this bulletin has been completed, and is largely unchanged from when it was reviewed at last month's RSCS meeting.
- b) The information covered in CB019 is considered to be Critical Electric Infrastructure Information (CEII) and is being withheld from the public. Anyone who would like a copy of CB019 will have to follow the CEII process. Members will have to fill out PJM's CEII Non-Disclosure Agreement (NDA) and PJM CEII Request Form.

8) Compliance Bulletin 20 update - NERC Standard CIP-014 (Ms. Monzon)

- a) The information pertaining to CIP-014 was removed from Compliance Bulletin 18, and restated as Compliance Bulletin 20 (see 6a above).
- b) None of the information on CIP-014 that was reviewed with the Subcommittee last month has changed
- c) PJM is working on finalizing this document.

9) Project 2015-04 Alignment of NERC Glossary of Terms and Definitions Used in the Rules of Procedure
Mr. Moleski reported that Mr. Scanlon is on this team, and he will report back to the Subcommittee at our July meeting.

10) COM-001 Communication Procedures – Mr Moleski

- a) Mr. Moleski reported that after conducting several TO/LCC Audits, PJM recommends that Transmission Owners review their respective evidence of compliance to the shared task from COM-001-1.1 R5. More specifically, each TO should ensure that they are providing clear evidence

- of a documented plan to send data to PJM as required by PJM Manual 1 Section 3.2.3 during the loss of EMS data exchange.
- b) Mr. Moleski stated that a very narrow, focused spot check of COM-001-1.1 R5 may be conducted by PJM in the next few months to ensure transmission owner compliance.
- 11) Mr. Kuras discussed a best practice COM-001-1 R5.
- a) Loss of data exchange may mean that the TO's EMS is still running, but the communications with PJM has been lost. For a large TO, data transmittal via spreadsheets and/or voice communications could be cumbersome and ineffective.
 - b) PJM recently audited a TO that has a procedure where all of the data points on their system are collected every half hour, put in a flat file, and transmitted to PJM by email. This process is in place at all times, and runs 24/7. In the event of loss of data exchange with PJM, no additional actions are required on the part of the TO.
- 12) Mr. Kuras discussed TO Restoration Plans and auditing of EOP-005-2
- a) PJM is charged with approving each of the member TO restoration plans. This Restoration Plan is to be submitted as a completed Attachment G from PJM Manual 36. The examination during a TO/TOP audit of these (previously approved) documents by the PJM Audit Team is seen as redundant.
 - b) In the future, it is PJM's intention to enhance Manual 36 Appendix G with the TO/TOP Matrix. Additionally, the PJM Compliance Department will be involved in the PJM review and approval of the Restoration Plans as they are submitted. This will dramatically reduce the on-site time that the Audit Team will need to review the assigned tasks under EOP-005.
 - c) Some areas (training, documentation, etc.) will still have to be covered during the Audit.
 - d) These assigned tasks will not be removed from the Matrix. This will be discussed in-depth at this afternoon's TTMS meeting under Agenda item #6
- 13) Mr. Herman updated the Subcommittee on the 2015 PRC-023-3 Facility List and Methodology per Requirement 6 of PRC-023-3
- a) PJM has distributed its methodology and facility list as required by Requirement 6 of PRC-023-3. This list was provided to all PJM TOs, GOs and DPs, as well as ReliabilityFirst and SERC via e-mail on Tuesday, May 12. The methodology can be found in Manual 14D. Anyone who would like to know if they have facilities on the list can send an e-mail to rtep@pjm.com. The next update will be available in May of 2016.

FERC Activities (11:00-11:10)

- 14) Recent compliance Related FERC activities (Mr. DiCaprio)
- a) FERC Order 808 was issued on COM-002-4 on April 16, 2015. Attempted to deliver clarity on what they deemed to be "other communications". Previously interpretation covered people working for the same company at different locations. This order could cover verbal conversations between operators sitting next to each other.
 - b) Order issued that approved the latest version of BAL-001-2. As part of this approval, NERC was requested to analyze the links between Area Control Area and transmission flows.
 - c) FERC issued a NOPR on PRC-002. FERC accepted the Standard as filed.

NERC and Regional Activities (11:10-11:20)

- 15) Committee Updates (Mr. DiCaprio)
 - a) There were no committee updates reported to the Subcommittee

- 16) Standards Under Development (Mr. Kuras)
 - a) Project 2015-02 Periodic Review of Emergency Operations
 - i) A review of the standards listed. P81 and IERP recommendations to be considered. Standards will also be converted to Results-Based Standards as needed.
 - ii) Posted information is in the format of review templates.
 - b) Project 2007-06 System Protection Coordination
 - i) Draft 5 of PRC-027-1 modifies the applicability of the standard to include "Protection Systems installed for the purpose of detecting Faults on BES Elements and isolating those faulted Elements," whereas, prior drafts of the standard limited the applicability to "Protection Systems installed for the purpose of detecting Faults on Interconnecting Elements." With this change to the applicability, the coordination of Protection Systems for all "internal" or "intra-entity" connections between BES Elements are addressed.
 - ii) PRC-027-1 clarifies the coordination aspects and incorporates the reliability objectives of Requirements R3 and R4 from PRC-001-1.1.
 - iii) As the draft exists today, it calls for a "quality review". There is much discussion, but little agreement on what a "quality review" is.
 - iv) PJM will be voting no.
 - c) Project 2010-031 FERC Order No. 804 Directives MOD-031-2 - SAR
 - i) The Standard Authorization Request (SAR) is for the continuation of Project 2010-04 MOD C. Purpose of this phase is to revise MOD-031-1 to resolve two directives from FERC Order 804:
 - (1) Obligations of the PC and BA to provide data to their Regional Entity
 - (2) The compliance obligations associated with the requests for confidential information

Member Issues (11:20-11:30)

- 17) Mr. Jerzycke asked if there was anything available that cross referenced the GO/GOP standards, and the manuals that they were covered by. Several committee members were aware of a PJM effort to do so several years ago. Mr. Moleski will research and report back to Mr. Jerzycke.

Future Agenda Items (11:30-11:40)

- 18)

Future Meeting Dates

Friday, June 19th,
2015

Friday, July 17th,-2015
Thursday, August 20th,

10:00 AM
10:00 AM

Cancelled

WebEx
Meeting and WebEx

2015, Friday, September 18th, 2015	10:00 AM	WebEx
Friday, October 16th, 2015	10:00 AM	WebEx
Thursday, November 19th, 2015	10:00 AM	Meeting and WebEx
Friday, December 18th, 2015	10:00 AM	WebEx

Author: Thomas Moleski

Anti-trust:

You may not discuss any topics that violate, or that might appear to violate, the antitrust laws including but not limited to agreements between or among competitors regarding prices, bid and offer practices, availability of service, product design, terms of sale, division of markets, allocation of customers or any other activity that might unreasonably restrain competition. If any of these items are discussed the chair will re-direct the conversation. If the conversation still persists, parties will be asked to leave the meeting or the meeting will be adjourned.

Code of Conduct:

As a mandatory condition of attendance at today's meeting, attendees agree to adhere to the PJM Code of Conduct as detailed in PJM Manual M-34 section 4.5, including, but not limited to, participants' responsibilities and rules regarding the dissemination of meeting discussion and materials.

Public Meetings/Media Participation:

Unless otherwise noted, PJM stakeholder meetings are open to the public and to members of the media. Members of the media are asked to announce their attendance at all PJM stakeholder meetings at the beginning of the meeting or at the point they join a meeting already in progress. Members of the Media are reminded that speakers at PJM meetings cannot be quoted without explicit permission from the speaker. PJM Members are reminded that "detailed transcriptional meeting notes" and white board notes from "brainstorming sessions" shall not be disseminated. Stakeholders are also not allowed to create audio, video or online recordings of PJM meetings.