

Reliability Standards and Compliance Subcommittee

WebEx and Meeting

Thursday, August 20, 2015

10:00 am to 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.

1) Administration

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

Subcommittee Members:

Mark L. Holman, Chair	Manager, NERC and Regional Coordination
Thomas Moleski, Secretary	Sr. Compliance Specialist, NERC and Regional Coordination
Jeff Baker	Duke Energy Ohio, Inc.
David Blackshear	Constellation Energy Control and Dispatch, LLC
Peter Buerling	FirstEnergy Corporation
Kathy Caignon	Vineland Municipal Electric Utility
Vince Catania	Exelon Business Services Company, LLC
Kelly Crist	EDP Renewables North America, LLC
Connie Davis	City of Cleveland, DPU, Div of Cleveland Public Pwr
David Fusek	Appalachian Power Company (IM Dedicated)
Marlene George	UGI Utilities, Inc.
Dan Griffiths	Consumer Advocates of PJM States
Stacey Harman	Baltimore Gas and Electric Company
Doug Hohlbaugh	FirstEnergy Solutions Corporation
Sandra Hopkins (ES)	Dominion Virginia Power
Mike Hurd	Dayton Power & Light Company (The)
Art Iler	American Municipal Power, Inc.
Doug Jerzycke	Exelon Generation Co., LLC
George Kogut	New York Power Authority
Christy Koncz	Public Service Electric & Gas Company
John Loftis	Virginia Electric & Power Company
Connie Lowe	Dominion Virginia Power
Jeffrey Mueller	Public Service Electric & Gas Company
Siobhan O'Connor	Energy Authority, Inc. (The)
Peg Petrusa	Commonwealth Edison Company
Stephanie Rhoads	Talen Energy Marketing, LLC
Sherri Rhodes	FirstEnergy Corporation
Chris Scanlon	Commonwealth Edison Company
Eric Sorber	UGI Utilities, Inc.
Bob Thomas	Illinois Municipal Electric Agency
David Thorne	Potomac Electric Power Company

Brenda Truhe
Steve Wittenauer
Katherine Zvomuya

Talen Energy Marketing, LLC
FirstEnergy Corporation
CPP

PJM Staff:

Joe Callis	Lead Security Analyst, CIP Compliance
Yonas Habtemichael	Engineer, Transmission Planning.
Bill Harm	Sr. Consultant, NERC and Regional Coordination
Bradley Hofferkamp	Sr. Analyst, CIP Compliance
Srinivas Kappagantula	Sr. Analyst, NERC and Regional Coordination
David Kimmell	Engineer, Performance Compliance
Danielle Martini	Engineer, Performance Compliance
Stephanie Monzon	Manager, CIP Compliance
Divya Paramesh	CIP Compliance Consultant, CIP Compliance
Jim Ruddell	Sr. Security Analyst, CIP Compliance
Victoria Schaeffer	Coop, NERC and Regional Coordination
David Schweizer	Manager, Generation.

b) Review of Administrative Documents (Mr. Moleski)

- i) Antitrust Guidelines
- ii) Code of Conduct
- iii) Compliance Disclaimer
- iv) Media Statement

There were no questions raised on the administrative documents

c) Approval of Agenda (Mr. Moleski)

The Agenda was approved as presented.

d) Approval of the July Meeting Minutes (Mr. Moleski)

The July meeting minutes were distributed without adequate time for the Subcommittee to review them. They will be presented for approval at the September RSCS Meeting.

2) PJM Compliance Activities

a) Manual Updates

- i) Review of Manual 10 (Mr. Schweizer)
 - Mr. Schweizer explained that the bulk of the changes came in Rules and regulation sections governing Planned and Maintenance Outages.
 - The eDART tool will be modified in the future to facilitate these changes.
 - Approval process is on track for a 10/2/15 implementation date

- Additional information can be found at: <http://www.pjm.com/~media/committees-groups/subcommittees/rscs/20150820/20150820-item-02a-manual-10-pre-scheduling-operations-draft-revisions-summary.ashx>
- ii) Review of Manual 14D (Mr. Schweizer)
- Changes based on the results of a review of the winter of 14/15, and a survey of the Operating Committee
 - Results were largely to continue with the status quo, and include only minor process changes
 - Approval process is on track for a 10/1/15 implementation date
 - Additional information can be found at: <http://www.pjm.com/~media/committees-groups/subcommittees/rscs/20150820/20150820-item-02a-cold-weather-resource-improvement-oc-results-of-july-2015-survey.ashx>
- b) **Review of the 2016 RSCS Meeting Schedule (Mr. Moleski)**
 Mr. Moleski announced that the RSCS meeting scheduled for October 21st in 2016 will conflict with the PJM Operations and Planning Audit. That meeting will be cancelled. There were no other conflicts mentioned, and the schedule was approved as modified.
- c) **Review of PJM's TO's Compliance Contact request. (Mr. Moleski)**
 Mr. Moleski discussed PJM's recent request of the Transmission Owners to update the existing list of compliance contacts. Three different contacts* are being sought:
- Every TO is required to provide one Primary compliance contact for TO/TOP issues
 - Every TO is required to designate at least one contact to receive CIP-002 and CIP-014 information, this person must be fully vetted through PJM's CEII clearance process
 - Every TO can supply as many names as they'd like to serve as alternate contacts
- *Contact designations are not exclusive. The Primary Contact can also serve as a CIP-002/14 contact. Similarly, a CIP-002/14 contact may or may not also serve as an alternate contact for TO/TOP issues. Mr. Moleski offered to try to assemble a new spreadsheet to remove some of the confusion around this effort.
- d) **Review Compliance Bulletins 18 and 20 (Ms. Monzon)**
- i) CB020 (CIP-014) provides information on how PJM, in its role as TP, RC, and PC performs an assessment to determine critical transmission related to the derivation of IROLS
- This is used as input for the TOs to do their risk assessment to determine what facilities they are required to protect
 - CB018 also outlines how to request a PJM third party validation required by CIP 014
 - Transmission Owners who have not already identified a contact to receive the results of this effort should send this information to Regional_Coordination@pjm.com
 - A copy of the Compliance Bulletin can be found at: <http://www.pjm.com/~media/documents/whitepapers/compliance/cb020-nerc-standard-cip-014-1.ashx>
- ii) CB018 (CIP-002) provides similar information to that contained in CB020, for generators
- Still in draft form, Ms. Monzon will have this available for the Subcommittee's September meeting

- Transmission Owners who have not already identified a contact to receive the results of the CIP-002 analysis should send this information to Regional_Coordination@pjm.com

e) Update on PJM's 2016 NERC Operations / Planning Audit. (Mr. Holman)

Mr. Holman disclosed that PJM's NERC audit will be October 17 - 21, 2016, with the 90-day letter expected by July 18, 2016. Once again, PJM will hold a mock audit with a small group of RSCS members as auditors. This is tentatively scheduled for early April. Mr. Holman urged interested members to contact regional_compliance@pjm.com if interested.

f) Review of changes to the RSCS pages on pjm.com (Mr. Moleski)

Mr. Moleski reminded the Subcommittee that most of the RSCS information used to be found under "*Markets and Operations*". In an effort to streamline the PJM website, all of the compliance information is now located under "*Documents*". Members who have specific pages bookmarked will be redirected to the correct page.

g) Review of Compliance Bulletin 16 (Mr. Harm)

This Bulletin was primarily issued to give interested parties a direct contact path to provide and receive information from PJM System Planning. Mr. Harm stressed that GOs who want to update information in the models that PJM uses for dynamic simulations *must* use the address provided. A copy of the latest version of Compliance Bulletin 16 can be found at:

<http://www.pjm.com/~media/documents/whitepapers/compliance/cb-016-mod-026-and-027.ashx>

h) Review of BAL-002-2 (Mr. Scanlon, Mr. Rust)

- New version clearly establishes ceiling of Most Severe SingleContingency for compliance.
- Many of the unnecessary reporting requirements were removed.
- Resolves conflict with EOP 002/EOP 011 - Allows for Firm Demand to be used for Contingency Reserve during an EEA, and allows for Contingency Reserve to be used for any event
 - Mr. Rust confirmed that it was intended that this was applicable during any level of EEA event
- Additional details can be found at: <http://www.pjm.com/~media/committees-groups/subcommittees/rscs/20150820/20150820-item-02h-rscs-bal-002-summary.ashx>

3) FERC Activities (11:00 – 11:15)

a) Recent compliance related FERC activities (Mr. Holman, Panel)

- No report

4) NERC and Regional Activities (11:15 – 11:45)

a) Committee Updates (Mr. Holman)

- Drafting Team being formed on Emergency Operations (EOP). PJM will have representation.
- Drafting Team being formed on System Operating Limits (SOL) PJM will have representation.

b) Standards Under Development (Mr. Kappagantula)

- i) BAL-002 – Ballot closes today, likely PJM will vote to support, Mr. Moleski will send a message to the RSCS e-mail list as soon as a final decision has been made
- ii) Project 2010-14.2.1 Phase 2 of Balancing Authority Reliability-based Controls
 - Periodic Review Team (PRT) recommended revisions to BAL-005-0.2b and BAL-006-2, first drafts are posted for comments
 - Initial Ballot and comment period closes on 9/12.
- iii) Project 2007-06.2 Phase 2 of System Protection Coordination
 - In conjunction with Phase 1, the project proposes to retire PRC-001-1.1(ii) as many of the requirements are addressed by other TOP/IRO standards
 - R1 will be incorporated into proposed Reliability Standard TOP- 009-1
 - R3 and R4 will be addressed by PRC-027-1
 - Initial Ballot and comment period closes on 9/11/2015
- iv) Project 2007-17.4 PRC-005
 - Addresses FERC Order No. 803 Directive to direct that NERC develop modifications to PRC-005-3 to include supervisory devices associated with auto-reclosing relay schemes to which the Reliability Standard applies
 - Draft 1 of PRC-005-6 posted for comment
 - Initial Ballot and comment period closes on 9/16/2015
- v) Project 2010-04.1 MOD-031 FERC Order No. 804 Directives
 - First Draft of MOD-031-2 posted for comment
 - The project will modify the language in R3 to clarify certain obligations to provide data to the Regional Entity and will also address the FERC directive to consider the compliance obligations of an applicable entity upon receipt of a data request that seeks confidential information
 - Initial Ballot and comment period closes on 9/18/2015

5) Member Issues (11:45 – 11:55)

None raised

6) Future Agenda Items (11:55 – 12:00)

No future agenda items recommended

7) Future Meeting Dates

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