

Comment Form — 1st Draft of SAR for Back-up Facilities

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background Information:

This project involves upgrading the requirements in these two standards:

COM-001: Telecommunications

EOP-008: Plans for Loss of Control Center Functionality

There are many stakeholder comments about this set of standards that need to be resolved. For example, the requirements in EOP-008 need additional specificity — for example R1 requires entities to have a contingency plan, but does not require that entities have the facilities identified in the plan. There are back-up facility requirements in several other standards (including COM-001), and this SAR would move all those requirements into either the certification standards or in this revised standard.

The *Federal Energy Regulatory Commission's (FERC's) October 20, 2006 Notice of Proposed Rulemaking (NOPR) on Mandatory Standards for the Bulk-Power System* included language that suggested the following changes should be made to EOP-008, and industry discussion is needed on these proposed changes:

- Include a Requirement that all reliability coordinators have full backup control centers since they are essential to Bulk-Power System reliability.
- Provision for back-up capabilities should be an explicit Requirement. Such backup capability, at a minimum, must: (1) be independent of the primary control center; (2) be capable of operating for a prolonged period of time; and (3) provide for a minimum set of tools and facilities to replicate the critical reliability functions of the primary control center.

The development may include other improvements to the standards deemed appropriate by the drafting team, with the consensus of stakeholders, consistent with establishing high quality, enforceable and technically sufficient bulk power system reliability standards.

You do not have to answer all questions. Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you believe that there is a reliability-related need to upgrade the requirements in this set of standards?

Yes

No

Comments: Yes, there is a reliability-related need. While we expect the backup requirements for Reliability Coordinators be fairly standard, a one-size fits all approach may not be appropriate for all other entities. A small TOP or BA can perform many of their tasks with lower tech tools.

The SAR needs additional definition. It should clearly define the bounds of the proposed standard.

2. Do you agree with the scope of the proposed project? (The scope includes all the items noted on the 'Standard Review Forms' attached to the SAR as well as other improvements to the standards that meet the consensus of stakeholders, consistent with establishing high quality, enforceable, and technically sufficient bulk power system reliability standards.)

Yes

No

Comments:

The Brief Description provides no bounds on the scope of the study or project. Expected cost, duration, participants, etc.

3. Please identify any additional revisions that should be incorporated into this set of standards, beyond those that have already been identified in the SAR.

Yes

No

Comments:

This does not appear to be a yes-no question.

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(Complete this page for comments from one organization or individual.)		
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NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
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1. Do you believe that there is a reliability-related need to upgrade the requirements in this set of standards?

Yes

No

Comments:

2. Do you agree with the scope of the proposed project? (The scope includes all the items noted on the 'Standard Review Forms' attached to the SAR as well as other improvements to the standards that meet the consensus of stakeholders, consistent with establishing high quality, enforceable, and technically sufficient bulk power system reliability standards.)

Yes

No

Comments:

3. Please identify any additional revisions that should be incorporated into this set of standards, beyond those that have already been identified in the SAR.

Yes

No

Comments: Reliability Coordinators (RC's) are dependent on data from control areas and transmission owners. RCs also rely on control areas and transmission owners to control the transmission system via SCADA, generators using AGC or voice communications to others like generator operators. Therefore Control Areas and Transmission Owners must also have backup facilities to provide critical data and controls even after the loss of their own control center. Voice circuits to backup centers are also needed.

Another problem area is Uninterruptible Power System or UPS. Failures of UPS are a leading factor in control center failure. Also, during a widespread blackout, UPS failures have occurred causing control center failure.

Communications circuits are needed from backup facilities for control areas or transmission owners to critical Reliability centers and backup centers, critical adjacent utilities, and large generators.

COM-001 does not address the need for voice or data communications circuits to generators. These circuits are required for AGC operation and also during emergencies including black start restoration. It may be addressed elsewhere in NERC standards.

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(Complete this page for comments from one organization or individual.)		
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Yes

No

Comments:

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Yes

No

Comments: Need to address that communication facilities should be compatible. For primary communications we are there just by evolution, but back-up communications could easily be diverse, especially at the Reliability Coordinator level.

3. Please identify any additional revisions that should be incorporated into this set of standards, beyond those that have already been identified in the SAR.

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No

Comments: Review training requirements to insure consistency and adequacy.

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(Complete this page for comments from one organization or individual.)		
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<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
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1. Do you believe that there is a reliability-related need to upgrade the requirements in this set of standards?

Yes

No

Comments:

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Yes

No

Comments:

3. Please identify any additional revisions that should be incorporated into this set of standards, beyond those that have already been identified in the SAR.

Yes

No

Comments:

COM-001-0/1

R1 needs clarification for "adequate and reliable".

R2 needs "and/or" clarification - is active monitoring satisfactory for compliance in lieu of testing? What does it mean to "alarm" a vital telecommunication facility? Is it the same as testing? Should a periodicity for testing be explicit? How is "vital" defined?

How is "special attention" defined?

R3 - what does "coordinate telecommunications" mean? Also, this requirement has no measure - should there be one?

EOP-008-0

Purpose - I have heard a lot of debate amongst industry members about whether a physical back up facility must exist or not, or if one just needs to have a 'plan'. This standard should make it explicitly clear as to whether a physical facility must exist. I believe it would be difficult to ensure the viability of a plan as required in R1.5 unless a physical facility existed.

R1.8 - what constitutes "interim" provisions? The standard should consider stating the required time to make a back up center operational. PER-003-0 has a seemingly out of place requirement in its measures section (M1.2) about having NERC certified operators

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at all times except for 4 hours for transition to a back up center. This might be a starting point.

VRFs - many appear to be administrative in nature, yet are rated as Medium. Please include in the review.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
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NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
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1. Do you believe that there is a reliability-related need to upgrade the requirements in this set of standards?

Yes

No

Comments: The requirements for backup facilities need more specificity in several areas.

2. Do you agree with the scope of the proposed project? (The scope includes all the items noted on the 'Standard Review Forms' attached to the SAR as well as other improvements to the standards that meet the consensus of stakeholders, consistent with establishing high quality, enforceable, and technically sufficient bulk power system reliability standards.)

Yes

No

Comments: The study of backup capabilities should be performed first, and then the SAR written to address the findings of the study.

3. Please identify any additional revisions that should be incorporated into this set of standards, beyond those that have already been identified in the SAR.

Yes

No

Comments:

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	David Kiguel	
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NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
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1. Do you believe that there is a reliability-related need to upgrade the requirements in this set of standards?

Yes

No

Comments: There is a need to upgrade requirements. The EOP and COM standards need to be rewritten to better reflect a requirement for backup control center in the event of the loss of the primary control center. The requirement for this backup control center should clearly articulate a minimum set of functional requirements.

However, we request clarification on this SAR before deciding if there is a reliability-related need to upgrade the requirements in this set of Standards. The SAR updates COM-001-0. The industry approved COM-001-1. What will happen to COM-001-1 if this SAR is approved? The Brief Description does not mention COM-001. Is that an oversight? Is this SAR only updating EOP-008? If this SAR updates COM-001, then what is that justification? The title of this SAR is Backup Facilities. Does that mean the updated COM-001 will apply only to backup facilities? Since the Interchange Authority (IA) should have at least an Area view, we suggest that the IA should be checked on. This assumes that the IA continues as a Functional Model Entity. This comment form's background information provides two solutions, 1) move the COM-001 requirements to other Standards or 2) update COM-001. We feel that decision is part of this SAR's scope. To fully explore moving COM-001 to other Standards, what are those other Standards? If moved, what happens to COM-001? We prefer that the other Standards reference COM-001 and that COM-001 be updated.

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Yes

No

Comments: Hydro One submits that the Scope is too open ended and removal of the word "full" from the phrase "full backup facility" is suggested.

Also, since Version 0, some in the industry have recommended that the NERCnet users be removed from the Applicability section as this is not an entity that is part of the NERC Functional Model.

We recommend that COM-001 R6 should not be a Reliability Requirement. R6 and Attachment 1 should be moved to a NERCnet procedure document. As written, the Requirements need better granularity so the industry can consistently measure compliance. The Requirements need to spell out the underlying assumptions such as "special attention" and the SAR's "shall do what" comment on R1.4.

3. Please identify any additional revisions that should be incorporated into this set of standards, beyond those that have already been identified in the SAR.

Yes

No

Comments: A study is referred to in the SAR. If a study is needed, what will be studied? What is in place today? What should be in place? If the study remains as part of the SAR, will the commenters decide what is required or will the requestor?

Hydro One has concerns regarding COM-001. R1.2 which states "Entities shall provide adequate and reliable telecommunications facilities to ensure the exchange of interconnection and operating information." We are concerned that this might be somewhat ambiguous and recommends improved definition of terms like "adequate", and perhaps some language that defines the parameters for the telecommunications facilities being provided. R3 says "Each RC, TOP and BA shall provide a means to coordinate telecommunications among their respective areas. This coordination shall include the ability to investigate and recommend solutions to telecommunications problems within the area and with other areas." In consideration of the addition of compliance measures, we suggest that R3 be reviewed to confirm the objectives sought by this requirement. Further, that the language for R3 then be modified to more clearly convey the essence of the requirement. R4 says "Unless agreed to otherwise, each RC, Top and BA shall use English as the language for all communications between and among operating personnel responsible for the real-time generation control and operation of the interconnected BES. TOP and BA may use an alternate language for internal operations." We have concerns regarding how R4 would be monitored for compliance.

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COM-001: Telecommunications

EOP-008: Plans for Loss of Control Center Functionality

There are many stakeholder comments about this set of standards that need to be resolved. For example, the requirements in EOP-008 need additional specificity — for example R1 requires entities to have a contingency plan, but does not require that entities have the facilities identified in the plan. There are back-up facility requirements in several other standards (including COM-001), and this SAR would move all those requirements into either the certification standards or in this revised standard.

The *Federal Energy Regulatory Commission's (FERC's) October 20, 2006 Notice of Proposed Rulemaking (NOPR) on Mandatory Standards for the Bulk-Power System* included language that suggested the following changes should be made to EOP-008, and industry discussion is needed on these proposed changes:

- Include a Requirement that all reliability coordinators have full backup control centers since they are essential to Bulk-Power System reliability.
- Provision for back-up capabilities should be an explicit Requirement. Such backup capability, at a minimum, must: (1) be independent of the primary control center; (2) be capable of operating for a prolonged period of time; and (3) provide for a minimum set of tools and facilities to replicate the critical reliability functions of the primary control center.

The development may include other improvements to the standards deemed appropriate by the drafting team, with the consensus of stakeholders, consistent with establishing high quality, enforceable and technically sufficient bulk power system reliability standards.

You do not have to answer all questions. Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you believe that there is a reliability-related need to upgrade the requirements in this set of standards?

Yes

No

Comments: Standard EOP - 008 contains all the necessary elements pertaining to Back-Up Control Center requirements.

2. Do you agree with the scope of the proposed project? (The scope includes all the items noted on the 'Standard Review Forms' attached to the SAR as well as other improvements to the standards that meet the consensus of stakeholders, consistent with establishing high quality, enforceable, and technically sufficient bulk power system reliability standards.)

Yes

No

Comments: The scope of this project should not be limited to just revising two Standards due to directives from regulatory bodies, but should be flexible to meet industry needs, whether additional or fewer Standards are required to address Back-Up Control Center and Communication needs.

3. Please identify any additional revisions that should be incorporated into this set of standards, beyond those that have already been identified in the SAR.

Yes

No

Comments: Requirements for emergency communication should include the concept that the communication infrastructure be consistent between Reliability Coordinators, Transmission Operators, Balancing Authorities, and other applicable entities under the Functional Model.

Comment Form — 1st Draft of SAR for Back-up Facilities

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(Complete this page for comments from one organization or individual.)		
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NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input checked="" type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background Information:

This project involves upgrading the requirements in these two standards:

COM-001: Telecommunications

EOP-008: Plans for Loss of Control Center Functionality

There are many stakeholder comments about this set of standards that need to be resolved. For example, the requirements in EOP-008 need additional specificity — for example R1 requires entities to have a contingency plan, but does not require that entities have the facilities identified in the plan. There are back-up facility requirements in several other standards (including COM-001), and this SAR would move all those requirements into either the certification standards or in this revised standard.

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- Include a Requirement that all reliability coordinators have full backup control centers since they are essential to Bulk-Power System reliability.
- Provision for back-up capabilities should be an explicit Requirement. Such backup capability, at a minimum, must: (1) be independent of the primary control center; (2) be capable of operating for a prolonged period of time; and (3) provide for a minimum set of tools and facilities to replicate the critical reliability functions of the primary control center.

The development may include other improvements to the standards deemed appropriate by the drafting team, with the consensus of stakeholders, consistent with establishing high quality, enforceable and technically sufficient bulk power system reliability standards.

You do not have to answer all questions. Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you believe that there is a reliability-related need to upgrade the requirements in this set of standards?

Yes

No

Comments:

We believe there is not a reliability-related need to upgrade the requirements in this set of standards. We do agree these standards need to be reviewed and revised to make them better standards.

2. Do you agree with the scope of the proposed project? (The scope includes all the items noted on the 'Standard Review Forms' attached to the SAR as well as other improvements to the standards that meet the consensus of stakeholders, consistent with establishing high quality, enforceable, and technically sufficient bulk power system reliability standards.)

Yes

No

Comments:

There are several issues within the proposed SAR that concern scope, timing and sequence.

Please indicate in the scope why these two seemingly unrelated standards are being revised together.

COM-001 R5 is the only part of COM-001 that is concerned with loss of telecommunications facilities. We suggest that the SAR contain an explicit statement that standard development be limited to revisions to COM-001 R5 only and no other part of COM-001 will be changed.

The reference to the certification standards should be deleted as there are no approved certification standards, or the statement should be modified from - identify which of these ARE essential to reliable operations - to - identify which of these, PLUS OTHERS, MAY BE essential to reliable operations".

Changes to these standards and requirements should be made based on the final rulemaking by FERC. They should not be made based on the NOPR and the SAR should so state.

The SAR should specify the sequence of standard development activity especially since there is a study required. The SAR should indicate that a study is required and the

Comment Form — 1st Draft of SAR for Back-up Facilities

study draft results will be circulated to the industry for comment and revision. Then, the SAR should state that revisions to EOP-008 and COM-001 R5 will be considered based on the results of that study.

We are concerned about the open-ended statements in the SAR. Those statements should be deleted or modified. The first is the statement that there are backup facility requirements in some other standard which should be moved into this standard. Those other standards should be specified in this SAR.

Additionally, the SAR contains the statement that - development may include other improvements to the standards deemed appropriate - should contain a statement that those other improvements will be limited to these two standards and approval of this SAR is not an open-ended approval to change standards and requirements other than EOP-008 and COM-001 R5 and back-up facility requirements that may be contained in the other standards specified in this SAR.

3. Please identify any additional revisions that should be incorporated into this set of standards, beyond those that have already been identified in the SAR.

Yes

No

Comments:

We have no additional revisions at this time.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
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<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background Information:

This project involves upgrading the requirements in these two standards:

COM-001: Telecommunications

EOP-008: Plans for Loss of Control Center Functionality

There are many stakeholder comments about this set of standards that need to be resolved. For example, the requirements in EOP-008 need additional specificity — for example R1 requires entities to have a contingency plan, but does not require that entities have the facilities identified in the plan. There are back-up facility requirements in several other standards (including COM-001), and this SAR would move all those requirements into either the certification standards or in this revised standard.

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The development may include other improvements to the standards deemed appropriate by the drafting team, with the consensus of stakeholders, consistent with establishing high quality, enforceable and technically sufficient bulk power system reliability standards.

You do not have to answer all questions. Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you believe that there is a reliability-related need to upgrade the requirements in this set of standards?

Yes

No

Comments:

2. Do you agree with the scope of the proposed project? (The scope includes all the items noted on the 'Standard Review Forms' attached to the SAR as well as other improvements to the standards that meet the consensus of stakeholders, consistent with establishing high quality, enforceable, and technically sufficient bulk power system reliability standards.)

Yes

No

Comments:

3. Please identify any additional revisions that should be incorporated into this set of standards, beyond those that have already been identified in the SAR.

Yes

No

Comments: It is recommended that a transition period of a couple of years be incorporated into the standard for being compliant with the new requirements. This will give the different entities time to get something constructed and maybe a new EMS system implemented before being compliant. In many cases there will be capital dollars that will need to be budgeted and spent and other major changes in order to be compliant.

Comment Form — 1st Draft of SAR for Back-up Facilities

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(Complete this page for comments from one organization or individual.)		
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NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
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Background Information:

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EOP-008: Plans for Loss of Control Center Functionality

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- Provision for back-up capabilities should be an explicit Requirement. Such backup capability, at a minimum, must: (1) be independent of the primary control center; (2) be capable of operating for a prolonged period of time; and (3) provide for a minimum set of tools and facilities to replicate the critical reliability functions of the primary control center.

The development may include other improvements to the standards deemed appropriate by the drafting team, with the consensus of stakeholders, consistent with establishing high quality, enforceable and technically sufficient bulk power system reliability standards.

You do not have to answer all questions. Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you believe that there is a reliability-related need to upgrade the requirements in this set of standards?

Yes

No

Comments:

Although NSTAR agrees there is a need to upgrade requirements, we believe the EOP and COM standard should to be rewritten to better reflect a requirement for backup control center in the event of the loss of the primary control center. The requirement for this backup control center should clearly articulate a minimum set of functional requirements.

Also, we request clarification on this SAR before deciding if there is a reliability-related need to upgrade the requirements in this set of Standards. The SAR proposes to update COM-001-0. The industry approved COM-001-1. What will happen to COM-001-1 if this SAR is approved? The Brief Description does not mention COM-001. Is that an oversight? Is this SAR only updating EOP-008? If this SAR updates COM-001, then what is that justification? The title of this SAR is Backup Facilities. Does that mean the updated COM-001 will apply to only backup facilities? This comment form's background information provides two solutions, 1) move the COM-001 requirements to other Standards or 2) update COM-001. We feel that decision is part of this SAR's scope.

2. Do you agree with the scope of the proposed project? (The scope includes all the items noted on the 'Standard Review Forms' attached to the SAR as well as other improvements to the standards that meet the consensus of stakeholders, consistent with establishing high quality, enforceable, and technically sufficient bulk power system reliability standards.)

Yes

No

Comments:

NSTAR believes the Scope is too open ended and removal of the word "full" from the phrase "full backup facility" is suggested.

Also, since Version 0, we have recommended that the NERCnet users be removed from the Applicability section. We cannot find NERCnet users in the Functional Model. We continue recommending that COM-001 R6 should not be a Reliability Requirement. R6 and Attachment 1 should be moved to a NERCnet procedure document. As written, the Requirements need better granularity so the industry can consistently measure compliance. The Requirements need to spell out the underlying assumptions such as "special attention" and the SAR's "shall do what" comment on R1.4.

3. Please identify any additional revisions that should be incorporated into this set of standards, beyond those that have already been identified in the SAR.

Yes

No

Comments:

A study is referred to in the SAR. If some study is needed, what will be studied? What is in place today? What should be in place? If the study remains as part of the SAR, will the commenters decide what is required or will the requestor?

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(Complete this page for comments from one organization or individual.)		
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NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
<input checked="" type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
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<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background Information:

This project involves upgrading the requirements in these two standards:

COM-001: Telecommunications

EOP-008: Plans for Loss of Control Center Functionality

There are many stakeholder comments about this set of standards that need to be resolved. For example, the requirements in EOP-008 need additional specificity — for example R1 requires entities to have a contingency plan, but does not require that entities have the facilities identified in the plan. There are back-up facility requirements in several other standards (including COM-001), and this SAR would move all those requirements into either the certification standards or in this revised standard.

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The development may include other improvements to the standards deemed appropriate by the drafting team, with the consensus of stakeholders, consistent with establishing high quality, enforceable and technically sufficient bulk power system reliability standards.

You do not have to answer all questions. Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you believe that there is a reliability-related need to upgrade the requirements in this set of standards?

Yes

No

Comments: The upgrade is needed in order to eliminate existing ambiguity and requirement redundancy.

2. Do you agree with the scope of the proposed project? (The scope includes all the items noted on the 'Standard Review Forms' attached to the SAR as well as other improvements to the standards that meet the consensus of stakeholders, consistent with establishing high quality, enforceable, and technically sufficient bulk power system reliability standards.)

Yes

No

Comments: ATC requests more detail on the scope and nature of the backup capability study identified in the "Brief Description" section of the SAR.

1)What specifically is going to be asked in the study?

a) Is the study going to include questions for both COM-001 and EOP-008?

2) Who is going to oversee the development and results of the study?

a) How are the results going to be incorporated into the revised Standards?

3) What is the goal of the study?

4) Why do the SAR's author(s) feel that a study needs to be performed before moving forward with improvements to the two standards?

It's difficult from ATC's perspective to completely agree with the scope of the SAR when a major part of the effort (the study) is not defined.

Second, the SAR identifies "new" Reliability Functions (Distribution Provider & Generator Operator) that may be subject to either one or both of these standards. Greater clarity needs to be provided as to how NERC will be expanding the Applicability of these standards. In other words, what existing requirements or new requirements would these entities be responsible for that they currently are not?

Third, ATC requests that NERC consider expanding the applicability of these standards to the TSP and Market Operator functions. As the industry evolves the loss of these entities facilities may also have a major impact on system reliability.

Fourth, the SAR states that there are back-up facility requirements in other standards that will be moved into this standard. That being the case, those standards with requirements that may be modified or "moved" as a result of this effort should be clearly identified under the "Related Standards" section of the Standard Authorization

Request Form. Currently this SAR has identified only the COM-001-0 and EOP-008-0 standards.

EOP-008-0

Per the Standards Review Form the Title of EOP-008 may be changed by dropping the words "Plans for" from the Standard's title. If that is to be done, then it is also important to clarify the Purpose of this Standard to align with the title. Currently, the "Purpose" of the standard is to: "have a plan to continue reliability operations in the event its control center becomes inoperable."

In the Standards Authorization Request Form, the Applicability section asks whether the reliability entity should be the TSP and not the TOP:

Question:

Isn't the reliability entity the TSP and not the TO as per the FM?

As a TOP, ATC believes that the standard needs to continue to apply to TOPs. That being said, the standard may also need to be expanded to apply to the TSP function as well.

ATC believes that the Standard Authorization Request Form should clearly identify which entity is responsible for each requirement under the existing standard. Two specific requirements that would benefit from additional clarification include: R1.2 and R1.3 where the functional model responsibilities of the BA and TOP have been intermingled. Requirement 1.2 requires the RC, TOP and BA to have procedures for providing basic tie line control, inter-area schedules and hourly accounting for all schedules. This is required of all three entities but should apply to the BA and TSP/Interchange Authority. Likewise requirement 1.3 lumps requirements specific to three different functional entities under a single umbrella. Each of the components under the requirement should be broken out to the appropriate applicable entity. For example, TOPs should be responsible for the control of critical transmission facilities and the control of critical substation devices. BAs should be responsible for generation control, time and frequency control. Both entities should be responsible for logging significant power system events. The SAR needs to address this issue so that each entity is able to clearly identify and comply with those items under their purview of control and not be held responsible for those items outside their control.

Similarly, any new requirements should clearly state who is responsible for performing that function.

COM-001-0

ATC believes that the Standard Authorization Request Form needs to be updated to reflect that the standard being worked on is COM-001-1 (Version 1) not COM-001-0 (Version 0). COM-001-0 is listed in the Standards Authorization Request Form even though COM-001-1 will become effective on January 1 2007.

The Applicability Section of this standard should be updated to remove "NERCNet User" from the list. A NERCNet user is not a defined term/entity under the NERC functional model and therefore, should not be used. NERC should take up any requirements for NERCNet users under a different forum (i.e. individual rules or agreements). In

addition to removing the NERCNet user from the applicability section the standard, NERC should also remove any related requirements for this "entity".

3. Please identify any additional revisions that should be incorporated into this set of standards, beyond those that have already been identified in the SAR.

Yes

No

Comments: ATC encourages the SC to select a wide range of individuals to work on these two standards. COM-001 will require the SDT to have some individuals with knowledge in telecommunication systems while EOP-008 requires individuals with an operations and facilities background.

The following comment is on the SAR's form.

Section: Reliability Functions

Function: Market Operator

Existing language: Integrates energy, capacity, balancing, and transmission resources to achieve an economic, reliability-constrained dispatch.

ATC is concerned with the word "economic" being included in the description of Market Operator. The purpose of the SAR process is to develop reliability standards and the word economic being included in this description may cause problems/confusion down the road.

Suggested language:

Integrates energy, capacity, balancing, and transmission resources to achieve a reliability-constrained dispatch.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
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NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input checked="" type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
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You do not have to answer all questions. Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you believe that there is a reliability-related need to upgrade the requirements in this set of standards?

Yes

No

Comments: Yes, EOP-008-0 is very weak in that it does not require the applicable entities to have a minimum defined level of backup capabilities nor to prove those backup capabilities. It is unacceptable that all that is required today is to have a set of plans.

2. Do you agree with the scope of the proposed project? (The scope includes all the items noted on the 'Standard Review Forms' attached to the SAR as well as other improvements to the standards that meet the consensus of stakeholders, consistent with establishing high quality, enforceable, and technically sufficient bulk power system reliability standards.)

Yes

No

Comments:

3. Please identify any additional revisions that should be incorporated into this set of standards, beyond those that have already been identified in the SAR.

Yes

No

Comments: None identified at this time.

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(Complete this page for comments from one organization or individual.)		
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Telephone:	816-654-1212	
E-mail:	jim.useldinger@kcpl.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input checked="" type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background Information:

This project involves upgrading the requirements in these two standards:

COM-001: Telecommunications

EOP-008: Plans for Loss of Control Center Functionality

There are many stakeholder comments about this set of standards that need to be resolved. For example, the requirements in EOP-008 need additional specificity — for example R1 requires entities to have a contingency plan, but does not require that entities have the facilities identified in the plan. There are back-up facility requirements in several other standards (including COM-001), and this SAR would move all those requirements into either the certification standards or in this revised standard.

The *Federal Energy Regulatory Commission's (FERC's) October 20, 2006 Notice of Proposed Rulemaking (NOPR) on Mandatory Standards for the Bulk-Power System* included language that suggested the following changes should be made to EOP-008, and industry discussion is needed on these proposed changes:

- Include a Requirement that all reliability coordinators have full backup control centers since they are essential to Bulk-Power System reliability.
- Provision for back-up capabilities should be an explicit Requirement. Such backup capability, at a minimum, must: (1) be independent of the primary control center; (2) be capable of operating for a prolonged period of time; and (3) provide for a minimum set of tools and facilities to replicate the critical reliability functions of the primary control center.

The development may include other improvements to the standards deemed appropriate by the drafting team, with the consensus of stakeholders, consistent with establishing high quality, enforceable and technically sufficient bulk power system reliability standards.

You do not have to answer all questions. Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you believe that there is a reliability-related need to upgrade the requirements in this set of standards?

Yes

No

Comments: SAR needs additional clarification.

COM-001

Generator Operators and Distribution Operators should be included as applicable entities for telecommunications information.

EOP-008

The bulleted items under "FERC NOPR" are reliability-related issues and should be considered for changes to the standard EOP-008.

2. Do you agree with the scope of the proposed project? (The scope includes all the items noted on the 'Standard Review Forms' attached to the SAR as well as other improvements to the standards that meet the consensus of stakeholders, consistent with establishing high quality, enforceable, and technically sufficient bulk power system reliability standards.)

Yes

No

Comments: There are no bounds to the scope of the project.

COM-001

Agree with addition of measures, non-compliance, and addition of applicability with Generator Operators and Distribution Operators, but do not agree with any of the other specific comments.

Agree with the proposed measures and non-compliance in COM-001 version 1 except for non-compliance 2.3.1 as a level 3 non-compliance. Recommend consideration be given to making this a level 2.

The comments under "VO Industry Comments" and "VRF Comments" are not specific enough to respond to.

EOP-008

Agree the plan should contain the provisions as suggested under bulleted items under "FERC NOPR" and do not agree with any of the other items. The comments under "VO Industry Comments" are not specific enough to respond to. The comments under "VRF Comments" are editorial and should not be considered for any modification to the standard EOP-008.

3. Please identify any additional revisions that should be incorporated into this set of standards, beyond those that have already been identified in the SAR.

Yes

No

Comments: This does not require a yes/no response. No other comments.

Comment Form — 1st Draft of SAR for Back-up Facilities

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You do not have to answer all questions. Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you believe that there is a reliability-related need to upgrade the requirements in this set of standards?

Yes

No

Comments: We agree that there should be more detailed information in the Standards, but would prefer to see the results of the "study" before commenting further.

2. Do you agree with the scope of the proposed project? (The scope includes all the items noted on the 'Standard Review Forms' attached to the SAR as well as other improvements to the standards that meet the consensus of stakeholders, consistent with establishing high quality, enforceable, and technically sufficient bulk power system reliability standards.)

Yes

No

Comments: Not enough detail to make an adequate determination. Why are we dealing with the Version 0 of COM-001 when version 1 is effective in January?

3. Please identify any additional revisions that should be incorporated into this set of standards, beyond those that have already been identified in the SAR.

Yes

No

Comments:

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Kevin Conway	
Organization:	PUD #2 of Grant County	
Telephone:	509-754-6639	
E-mail:	kconway@gcopud.org	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
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The development may include other improvements to the standards deemed appropriate by the drafting team, with the consensus of stakeholders, consistent with establishing high quality, enforceable and technically sufficient bulk power system reliability standards.

You do not have to answer all questions. Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you believe that there is a reliability-related need to upgrade the requirements in this set of standards?

Yes

No

Comments: I don't believe there is a reliability rated need per se, but there does seem to be a need to improve the standards to allow consistent evaluation of the back-up plans and facilities during audits and inspections.

2. Do you agree with the scope of the proposed project? (The scope includes all the items noted on the 'Standard Review Forms' attached to the SAR as well as other improvements to the standards that meet the consensus of stakeholders, consistent with establishing high quality, enforceable, and technically sufficient bulk power system reliability standards.)

Yes

No

Comments: The scope seems appropriate, but I am afraid that it may create an overly burdensome standard during the drafting process.

3. Please identify any additional revisions that should be incorporated into this set of standards, beyond those that have already been identified in the SAR.

Yes

No

Comments: It should be communicated clearly that any transition to a back up center should allow for the continued normal operation of tasks and functions. The standard should be built on this concept, and should still allow for the type of tasks being done by the entity, and the level of effect that the entity has on the BES.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Michael Anthony	
Organization:	Progress Energy Carolinas	
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E-mail:	mike.anthony@pgnmail.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
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You do not have to answer all questions. Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you believe that there is a reliability-related need to upgrade the requirements in this set of standards?

Yes

No

Comments:

2. Do you agree with the scope of the proposed project? (The scope includes all the items noted on the 'Standard Review Forms' attached to the SAR as well as other improvements to the standards that meet the consensus of stakeholders, consistent with establishing high quality, enforceable, and technically sufficient bulk power system reliability standards.)

Yes

No

Comments:

3. Please identify any additional revisions that should be incorporated into this set of standards, beyond those that have already been identified in the SAR.

Yes

No

Comments: We agree that the EOP-008 standard should require that Backup Control Centers to be functionally viable for managing long-term operation of the bulk electric system from the backup control center facility. With respect to COM-001, which this SAR puts in tandem with EOP-008, the requirement to maintain dedicated and redundant communications channels and plans for continued operations with loss of telecommunications should be required of LSEs and Generator Operators as well. This revision will require third party generators to provide for adequate communications to facilitate reliable operations for the BAs and TOPs.

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NERC Region		Registered Ballot Body Segment
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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you believe that there is a reliability-related need to upgrade the requirements in this set of standards?

Yes

No

Comments:

2. Do you agree with the scope of the proposed project? (The scope includes all the items noted on the 'Standard Review Forms' attached to the SAR as well as other improvements to the standards that meet the consensus of stakeholders, consistent with establishing high quality, enforceable, and technically sufficient bulk power system reliability standards.)

Yes

No

Comments: Please define the acronym VRF that appears in the To Do List.

While we agree with the scope of the project, we feel that clarification of terms is necessary to facilitate an improved standard.

Inclusion of a requirement that all reliability coordinators have full backup control centers is included in first bullet of the To Do List. The meaning of "full" is unclear. The level of independence required in the second bullet of the To Do List needs to be specified. Does "independent" mean that separate RTU's and communication paths are needed for a backup facility, that there is no single point of failure shared between the two facilities, or does that term carry some other meaning?

The second bullet of the To Do List specifies that the backup facility must be capable of operating for a prolonged period of time, but the meaning of "prolonged" remains unclear.

3. Please identify any additional revisions that should be incorporated into this set of standards, beyond those that have already been identified in the SAR.

Yes

No

Comments:

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Comments:

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Yes

No

Comments:

3. Please identify any additional revisions that should be incorporated into this set of standards, beyond those that have already been identified in the SAR.

Yes

No

Comments: None identified.

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Individual Commenter Information		
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Name:	Robert Coish	
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Telephone:	204-487-5479	
E-mail:	rgcoish@hydro.mb.ca	
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You do not have to answer all questions. Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you believe that there is a reliability-related need to upgrade the requirements in this set of standards?

Yes

No

Comments:

2. Do you agree with the scope of the proposed project? (The scope includes all the items noted on the 'Standard Review Forms' attached to the SAR as well as other improvements to the standards that meet the consensus of stakeholders, consistent with establishing high quality, enforceable, and technically sufficient bulk power system reliability standards.)

Yes

No

Comments: Define "CESDT". This SAR says that a study of the backup capabilities that are needed to support reliable operations is required as part of this project. It is not clear what is the intended scope of this study. It might be helpful to the drafting team if the SAR indicated the expected time line to complete the work outlined in this SAR - perhaps by referring to the 2007-2009 work plan if timeframe is specified there.

3. Please identify any additional revisions that should be incorporated into this set of standards, beyond those that have already been identified in the SAR.

Yes

No

Comments: COM-001-0 and -1

R1 what is "adequate", needs to be defined. "Interconnection and operating information", does this include data transfer as well as communications?

R1.2 Should this not read: "Between the Reliability Coordinators, Transmission Operators, and Balancing Authorities." This sounds like one way communications between the RC and TO's and BA's.

R2 - define "vital".

R4 - "Unless agreed to otherwise" needs to be defined by whom?

COM-001-1

R1 - Missing the word "for" between "facilities the".

EOP-008-0

R1.5 - Need to define "periodic tests", this could vary from one company testing annually to another company testing every 5 years, to each periodic testing is met.

This SAR should require that Violation Risk Factors be assigned to the requirements of COM-001 and EOP-008 and be included in the subsequently . Coordinate assignment of

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VRF's with current ballot on Version 0 VRF and proposed VRF's for Version 1, as appropriate.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Ron Falsetti	
Organization:	IESO	
Telephone:	905-855-6187	
E-mail:	ron.falsetti@ieso.ca	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background Information:

This project involves upgrading the requirements in these two standards:

COM-001: Telecommunications

EOP-008: Plans for Loss of Control Center Functionality

There are many stakeholder comments about this set of standards that need to be resolved. For example, the requirements in EOP-008 need additional specificity — for example R1 requires entities to have a contingency plan, but does not require that entities have the facilities identified in the plan. There are back-up facility requirements in several other standards (including COM-001), and this SAR would move all those requirements into either the certification standards or in this revised standard.

The *Federal Energy Regulatory Commission's (FERC's) October 20, 2006 Notice of Proposed Rulemaking (NOPR) on Mandatory Standards for the Bulk-Power System* included language that suggested the following changes should be made to EOP-008, and industry discussion is needed on these proposed changes:

- Include a Requirement that all reliability coordinators have full backup control centers since they are essential to Bulk-Power System reliability.
- Provision for back-up capabilities should be an explicit Requirement. Such backup capability, at a minimum, must: (1) be independent of the primary control center; (2) be capable of operating for a prolonged period of time; and (3) provide for a minimum set of tools and facilities to replicate the critical reliability functions of the primary control center.

The development may include other improvements to the standards deemed appropriate by the drafting team, with the consensus of stakeholders, consistent with establishing high quality, enforceable and technically sufficient bulk power system reliability standards.

You do not have to answer all questions. Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you believe that there is a reliability-related need to upgrade the requirements in this set of standards?

Yes

No

Comments: We agree that the 2 standards should be tightened up to meet reliability needs and FERC's request. However, we don't think the scope of this SAR is clearly defined (see comment on Q2 below). The SAR proposes to update COM-001-0 but the industry has already approved COM-001-1. What will happen to COM-001-1 if this SAR is approved? Please clarify.

2. Do you agree with the scope of the proposed project? (The scope includes all the items noted on the 'Standard Review Forms' attached to the SAR as well as other improvements to the standards that meet the consensus of stakeholders, consistent with establishing high quality, enforceable, and technically sufficient bulk power system reliability standards.)

Yes

No

Comments: (1) The Brief Description does not provide any bounds on the work that is envisioned. For example, it was mentioned that "there are backup requirements in some other standards", which standards are they? Further, there is no elaboration on what "study" will be conducted, which leaves the industry to speculate what study and its scope are being pursued, and how its outcomes may affect the standards. The industry is left without any clue to offer comments on this particular issue.

(2) If COM-001-1 is to be revised, then we offer the following suggestions:

(i) Since Version 0, we have recommended that the NERCnet users be removed from the Applicability section. We cannot find NERCnet users in the Functional Model. The Requirements need to spell out the underlying assumptions such as "special attention" and the SAR's "shall do what" comment on R1.4.

(ii) R1.2:

Entities shall provide adequate and reliable telecommunications facilities to ensure the exchange of interconnection and operating information.

The IESO is concerned that this might be somewhat ambiguous and recommends improved definition of terms like "adequate", and perhaps some language that defines the parameters for the telecommunications facilities being provided.

(iii) R3:

Each RC, TOP and BA shall provide a means to coordinate telecommunications among their respective areas. This coordination shall include the ability to investigate and recommend solutions to telecommunications problems within the area and with other areas.

In consideration of the addition of compliance measures, we suggest that R3 be reviewed to confirm the objectives sought by this requirement. Further, the language for R3 needs to be modified to more clearly convey the essence of the requirement.

(iv) R4:

Unless agreed to otherwise, each RC, Top and BA shall use English as the language for all communications between and among operating personnel responsible for the real-time generation control and operation of the interconnected BES. TOP and BA may use an alternate language for internal operations.

We have concerns regarding how R4 would be monitored for compliance.

(v) R6:

Each NERCNet User Organization shall adhere to the requirements in Attachment 1-COM-001-0, "NERCNet Security Policy".

We recommend R6 be removed from the COM-001 requirements as it is considered general terms for completing the NERCnet application.

(vi) Lastly, we question whether or not COM-001 should remain as a standard since most of the requirements were mapped to existing documents (some with the exact same language as the requirement), while requirements such as R1.2, R3 and R4 contain ambiguous language leaving margin for being misinterpreted.

3. Please identify any additional revisions that should be incorporated into this set of standards, beyond those that have already been identified in the SAR.

Yes

No

Comments: (1) Without knowing the bounds of the work and the purpose and expected outcomes of the "study", we are unable to offer further comments but feel uncomfortable to be asked to support this SAR to start standard development work.

(2) Since some transmission owning entities may not register as a TOP but may have local control tasks assigned to it by the TOP, the Transmission Owner should also be included as an Applicable entity for both EOP-008 and COM-001.

Comment Form — 1st Draft of SAR for Back-up Facilities

Please use this form to submit comments on the proposed SAR for Back-up Facilities. Comments must be submitted by **December 5, 2006**. You may submit the completed form by e-mail to sarcomm@nerc.com with the words "Back-up Facilities" in the subject line. If you have questions please contact Ed Dobrowolski at Ed.Dobrowolski@nerc.net or by telephone at 609-452-8060.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
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The development may include other improvements to the standards deemed appropriate by the drafting team, with the consensus of stakeholders, consistent with establishing high quality, enforceable and technically sufficient bulk power system reliability standards.

You do not have to answer all questions. Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you believe that there is a reliability-related need to upgrade the requirements in this set of standards?

Yes

No

Comments: Admittedly, there are some "holes" in the current version.

2. Do you agree with the scope of the proposed project? (The scope includes all the items noted on the 'Standard Review Forms' attached to the SAR as well as other improvements to the standards that meet the consensus of stakeholders, consistent with establishing high quality, enforceable, and technically sufficient bulk power system reliability standards.)

Yes

No

Comments: The scope appears reasonable in order to provide measurable requirements. Please define the acronym "VRF" that appears as comments in the To Do List.

3. Please identify any additional revisions that should be incorporated into this set of standards, beyond those that have already been identified in the SAR.

Yes

No

Comments: Regarding R1.5, where it talks of ". . . conducting periodic tests, at least annually . . ." I would suggest monthly instead, but this has effects outside of just CA.

Also, the NERC proposed changes talk of ". . . (2) be capable of operating for a prolonged period of time; . . ." And we have a 10 year schedule to add all of our existing RTUs to TCC. I assume that if TCC became our only dispatch center, would we accelerate this?