

Consideration of Comments on 1st Draft of Backup Facilities SAR

The Backup Facilities SAR Drafting Team thanks all commenters who submitted comments on Draft 1 of the Backup Facilities SAR. This SAR was posted for a 30-day public comment period from November 6 through December 5, 2006. The Backup Facilities SAR Drafting Team asked stakeholders to provide feedback on the standard through a special standard Comment Form. There were 23 sets of comments, including comments from more than 60 different people from more than 25 companies representing 8 of the 10 Industry Segments as shown in the table on the following pages.

Based upon industry comments, the SAR DT determined that there is a reliability requirement for this SAR on back-up capabilities. Most of the comments were associated with points of clarification.

The questions/concerns raised by stakeholders centered around 8 areas:

- The study of backup capabilities referenced in the SAR — the drafting team modified the SAR to clarify that the work of the OC Backup Control Center Task Force will be used as one of the inputs to the revision of EOP-008
- The inclusion of the 'COM' standards in the SAR — the drafting team removed COM-001 from the list of standards to be addressed with this project
- References to backup capabilities in other Reliability Standards — the drafting team modified the SAR to clarify that there 'may' be some requirements for backup capabilities in other Reliability Standards and added IRO-002 to the list of related standards because it does contain some backup facility requirements
- Information in Appendix B — the drafting team modified the SAR to clarify that Appendix B is an informative attachment that contains material for consideration in the standards revision process, but should not be considered to contain mandatory changes to the standard.
- The inclusion of Distribution Provider and Generation Operator in the SAR — the drafting team modified to SAR to remove the Distribution Provider and Generator Operator as responsible entities.
- The relationship between Transmission Operators and other functions such as Transmission Owners and Market Operators as it relates to applicability in this SAR — the drafting team did add clarifying language to the SAR to indicate that the standard will apply to apply to any entity for which the loss of its primary control capability would impose a significant real-time reliability risk to the Bulk Power System; while Transmission Owners were added to the list of applicable functions, the Market Operator was not added to the SAR.
- The specification of standard requirements and the entities to which they would apply — the drafting team revised the SAR to indicate that the standard will be applicable to the Reliability Coordinator, Balancing Authority or Transmission Operator and to any entity performing reliability functions as a result of delegation of tasks from those entities.
- The lack of clarity and conceptual bounds with regards to the scope of the SAR — the drafting team added more specificity to clarify that the objective of the standard is to emphasize the continuation of functionality needed for reliable system operation regardless of the manner in which it is achieved.

The SAR Drafting Team responded to each of these areas with specificity appropriate for the SAR drafting stage. The intent of the SAR Drafting Team is to provide the conceptual boundaries around Backup Capability, while providing ample flexibility to the Standard Drafting Team to develop clear and crisp reliability standards with respect to backup capability. We believe that the revisions made to the SAR provide this flexibility and clarity.

Based on the comments received, the drafting team is re-posting the SAR for a second comment period.

In this 'Consideration of Comments' document stakeholder comments have been organized so that it is easier to see the responses associated with each question. All comments received on the SAR can be viewed in their original format at:

http://www.nerc.com/~filez/standards/Backup_Facilities.html

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If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Director of Standards, Gerry Adamski at 609-452-8060 or at gerry.adamski@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

¹ The appeals process is in the Reliability Standards Development Procedures: <http://www.nerc.com/standards/newstandardsprocess.html>.

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Commenter		Organization	Industry Segment											
			1	2	3	4	5	6	7	8	9	10		
1.	James Sorrels	American Electric Power	✓				✓	✓						
2.	Jason Shaver	American Transmission Company	✓											
3.	Terry Doern	Bonneville Power Administration	✓											
4.	Edward Davis	Entergy Services, Inc.	✓											
5.	Will Franklin	Entergy Services, Inc.						✓						
6.	David Kiguel	Hydro One Networks Inc.	✓											
7.	Ron Falsetti	Independent Electricity System Operator		✓										
8.	Roderick Conwell	IPL	✓											
9.	Charles Yeung (SPP)	IRC Standards Review Committee		✓										
10.	Tom Bowe (PJM)	IRC Standards Review Committee		✓										
11.	Mike Calimano (NYISO)	IRC Standards Review Committee		✓										
12.	Ron Falsetti (IESO)	IRC Standards Review Committee		✓										
13.	Matt Goldberg (ISONE)	IRC Standards Review Committee		✓										
14.	Brent Kingsford (CAISO)	IRC Standards Review Committee		✓										
15.	Anita Lee (AESO)	IRC Standards Review Committee		✓										
16.	Steve Myers (ERCOT)	IRC Standards Review Committee		✓										
17.	Bill Phillips (MISO)	IRC Standards Review Committee		✓										
18.	Kathleen Goodman	ISO New England		✓										
19.	Brian Thumm	ITC Transmission	✓											
20.	Jim Cyrulewski	JDRJC Associates								✓				
21.	Jim Useldinger	Kansas City Power & Light Company	✓											
22.	Robert Coish	Manitoba Hydro	✓		✓			✓	✓					
23.	Dede Subakti	Midwest ISO, Inc.		✓										
24.	Terry Bilke	Midwest ISO, Inc.		✓										
25.	Guy Zito (NPCC)	NPCC CP9 Reliability Standards Working Group		✓										
26.	Ralph Rufrano (NYPA)	NPCC CP9 Reliability Standards Working Group	✓											
27.	Kathleen Goodman (ISONE)	NPCC CP9 Reliability Standards Working Group		✓										
28.	Bill Shemley (ISONE)	NPCC CP9 Reliability Standards Working Group		✓										

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Commenter		Organization	Industry Segment											
			1	2	3	4	5	6	7	8	9	10		
29.	Greg Campoli (NYISO)	NPCC CP9 Reliability Standards Working Group		✓										
30.	Roger Champagne (TEHQ)	NPCC CP9 Reliability Standards Working Group	✓											
31.	David Kiguel (Hydro One)	NPCC CP9 Reliability Standards Working Group	✓											
32.	Herbert Schrayshuen (NGrid)	NPCC CP9 Reliability Standards Working Group	✓											
33.	Donald Nelson (MA Dept. of Tele and Energy)	NPCC CP9 Reliability Standards Working Group										✓		
34.	Ed Thompson (ConEd)	NPCC CP9 Reliability Standards Working Group	✓											
35.	Ron Falsetti (IESO)	NPCC CP9 Reliability Standards Working Group		✓										
36.	Alan Adamson (NYSRC)	NPCC CP9 Reliability Standards Working Group												✓
37.	Jerad Barnhart	NSTAR Electric	✓											
38.	Michael Anthony	Progress Energy Carolinas	✓											
39.	Phil Riley	Public Service Commission of SC										✓		
40.	Mignon L. Clyburn	Public Service Commission of SC										✓		
41.	Elizabeth B. Fleming	Public Service Commission of SC										✓		
42.	G. O'Neal Hamilton	Public Service Commission of SC										✓		
43.	John E. Howard	Public Service Commission of SC										✓		
44.	Randy Mitchell	Public Service Commission of SC										✓		
45.	C. Robert Moseley	Public Service Commission of SC										✓		
46.	David A. Wright	Public Service Commission of SC										✓		
47.	Kevin Conway	PUD #2 of Grant County				✓								
48.	Mike Gentry	Salt River Project	✓											
49.	Gary Strickler	Salt River Project	✓											
50.	J.T. Wood	Southern Company Services, Inc.	✓											
51.	Marc Butts	Southern Company Services, Inc.	✓											
52.	Roman Carter	Southern Company Services, Inc.	✓											
53.	Steve Corbin	Southern Company Services, Inc.	✓											
54.	Kathy Davis	Tennessee Valley Authority	✓											

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Commenter		Organization	Industry Segment											
			1	2	3	4	5	6	7	8	9	10		
55.	Sue Mangum Goins	Tennessee Valley Authority	✓											
56.	Mark Creech	Tennessee Valley Authority	✓											
57.	Earl Shockley	Tennessee Valley Authority	✓											
58.	Jerry Landers	Tennessee Valley Authority	✓											
59.	Nancy Bellows (WACM)	WECC Reliability Coordination Comments Work Group		✓										
60.	Terry Baker (PRPA)	WECC Reliability Coordination Comments Work Group		✓										
61.	Tom Botello (SCE)	WECC Reliability Coordination Comments Work Group		✓										
62.	Richard Ellison (BPA)	WECC Reliability Coordination Comments Work Group		✓										
63.	Mike Gentry (SRP)	WECC Reliability Coordination Comments Work Group		✓										
64.	Robert Johnson (PSC)	WECC Reliability Coordination Comments Work Group		✓										
65.	Greg Tillitson (CMRC)	WECC Reliability Coordination Comments Work Group		✓										
66.	Martin Trencce	Xcel Energy – NSP	✓											

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1. Do you believe that there is a reliability-related need to upgrade the requirements in this set of standards? 7

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.) 11

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. 20

Consideration of Comments on 1st Draft of Backup Facilities SAR

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

Summary Consideration:

Most commenters indicated that they do believe that there is a reliability-related need to upgrade the requirements in this set of standards.

Question #1			
Commenter	Yes	No	Comment
Entergy Services, Inc.		<input checked="" type="checkbox"/>	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.
Response: The SAR Drafting Team recognizes that whether there is a reliability-related need is subjective and open to interpretation of the question, but does agree with the commenters' conclusion that the standards need to be upgraded and improved.			
PUD #2 of Grant County		<input checked="" type="checkbox"/>	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.
Response: The SAR Drafting Team recognizes that whether there is a reliability-related need is subjective and open to interpretation of the question, but does agree with the commenters' conclusion that the standards need to be upgraded and improved.			
Hydro One Networks Inc.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<p>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.</p> <p>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.</p>
Response: The SAR Drafting Team agrees that the standard needs to be upgraded. The reference in the draft SAR to COM-001-0 was an oversight. However, the SAR Drafting Team agrees the current wording in the "Brief Description" section does not address COM-001 and after discussion has determined to delete COM-001 from this SAR. COM-001 deals with communications in a generic sense and does not specifically relate to backup facilities. Consideration for communications support explicitly for backup facilities will be included in the scope of this SAR.			
NPCC CP9 Reliability Standards Working Group	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	NPCC Participating Members agree there is a need to upgrade requirements. We believe the EOP and COM standard needs to be rewritten to better reflect a requirement for backup

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Question #1			
Commenter	Yes	No	Comment
			<p>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.</p> <p>Also, NPCC participating members 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 to only 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.</p>
<p>Response: The SAR Drafting Team agrees that the standard needs to be upgraded. The reference in the draft SAR to COM-001-0 was an oversight. However, the SAR Drafting Team agrees the current wording in the "Brief Description" section does not address COM-001 and after discussion has determined to delete COM-001 from this SAR. COM-001 deals with communications in a generic sense and does not specifically relate to backup facilities. Consideration for communications support explicitly for backup facilities will be included in the scope of this SAR.</p>			
NSTAR Electric ISO New England	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<p>Although NSTAR (ISO NE) 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.</p> <p>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.</p>
<p>Response: The SAR Drafting Team agrees that the standard needs to be upgraded. The reference in the draft SAR to COM-001-0 was an oversight. However, the SAR Drafting Team agrees the current wording in the "Brief Description" section does not address COM-001 and after discussion has determined to delete COM-001 from this SAR. COM-001 deals with communications in a generic sense and does not specifically relate to backup facilities. Consideration for communications support explicitly for backup facilities will be included in the scope of this SAR.</p>			

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Question #1			
Commenter	Yes	No	Comment
MISO, IPL, JDRJC Associates	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	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.
Response: The SAR Drafting Team agrees with the comment that a "one-size fits all approach may not be appropriate" and has reflected that in the revised SAR.			
Independent Electricity System Operator	<input checked="" type="checkbox"/>		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.
Response: The SAR Drafting Team agrees that the standard needs to be upgraded. The reference in the draft SAR to COM-001-0 was an oversight. However, the SAR Drafting Team agrees the current wording in the "Brief Description" section does not address COM-001 and after discussion has determined to delete COM-001 from this SAR. COM-001 deals with communications in a generic sense and does not specifically relate to backup facilities. Consideration for communications support explicitly for backup facilities will be included in the scope of this SAR. The SAR DT discussed the applicability of the IA to this SAR and decided that the IA was not an applicable entity in this regard. We believe that the true responsible entities are the RC, BA and TOP. The SAR Drafting Team agrees with the comment that a "one-size fits all approach may not be appropriate" and has reflected that in the revised SAR.			
ITC Transmission	<input checked="" type="checkbox"/>		The requirements for backup facilities need more specificity in several areas.
Response: The SAR Drafting Team agrees with the comments concerning the need for upgrades to the standard.			
American Transmission Company	<input checked="" type="checkbox"/>		The upgrade is needed in order to eliminate existing ambiguity and requirement redundancy.
Response: The SAR Drafting Team agrees with the comments concerning the need for upgrades to the standard.			
American Electric Power	<input checked="" type="checkbox"/>		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.
Response: The SAR Drafting Team agrees with the comments concerning the need for upgrades to the standard.			
Salt River Project	<input checked="" type="checkbox"/>		Admittedly, there are some "holes" in the current version.
Response: The SAR Drafting Team agrees with the comment that there are some "holes" in the current version.			
Kansas City Power & Light Company	<input checked="" type="checkbox"/>		SAR needs additional clarification. COM-001 Generator Operators and Distirbition Operators should be included as applicable entities for

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Question #1			
Commenter	Yes	No	Comment
			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.
<p>Response: The SAR Drafting Team agrees the SAR needs additional clarification and believes the specific matters raised by this commenter with regard to EOP-008 are within the scope of this SAR as revised.</p> <p>After discussion the SAR DT has decided to delete COM-001 from this SAR. COM-001 deals with communications in a generic sense and does not specifically relate to backup facilities. Consideration for communications support explicitly for backup facilities will be included in the scope of this SAR.</p>			
Tennessee Valley Authority	<input checked="" type="checkbox"/>		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.
<p>Response: The SAR DT is going to work closely with the OC Backup Control Center Task Force. Several members of that task force are also serving on the SAR DT. The goal of this effort is to start the standards effort at the time that the draft of the OC study is available. The project schedule supports this timing.</p>			
Midwest ISO, Inc.	<input checked="" type="checkbox"/>		Standard EOP - 008 contains all the necessary elements pertaining to Back-Up Control Center requirements.
<p>Response: The SAR Drafting Team agrees that the current EOP-008 standard contains many of the necessary elements, but believes there are several areas within the standard that need to be upgraded such as requiring capability as opposed to simply having a plan.</p>			
Bonneville Power Administration	<input checked="" type="checkbox"/>		
Xcel Energy – NSP	<input checked="" type="checkbox"/>		
IRC Standards Review Committee	<input checked="" type="checkbox"/>		
Southern Company Services, Inc.	<input checked="" type="checkbox"/>		
Entergy Services, Inc.	<input checked="" type="checkbox"/>		
Progress Energy Carolinas	<input checked="" type="checkbox"/>		
WECC Reliability Coordination Comments Work Group	<input checked="" type="checkbox"/>		
Public Service Commission of SC	<input checked="" type="checkbox"/>		
Manitoba Hydro	<input checked="" type="checkbox"/>		

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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.)

Summary Consideration: Most commenters disagreed with the scope of the proposed project and, based on stakeholder comments, the drafting team made the following changes to the SAR:

- Clarified that Appendix B is an informative attachment that contains material for consideration in the standards revision process. It should not be considered to contain mandatory changes to the standard.
- Removed COM-001 from the list of standards addressed by the SAR. COM-001 deals with communications in a generic sense and does not specifically relate to backup facilities. Consideration for communications support explicitly for backup facilities will be included in the scope of this SAR.
- Removed references to certification standards from the SAR
- Clarified that the work of the Operating Committee’s Backup Control Center Task Force study will be used as an input to the development of the standard’s requirements. The goal of this effort is to start the standards effort at the time that the draft of the OC study is available. The project schedule supports this timing.

Question #2			
Commenter	Yes	No	Comment
ITC Transmission		<input checked="" type="checkbox"/>	The study of backup capabilities should be performed first, and then the SAR written to address the findings of the study.
Response: The SAR DT is going to work closely with the OC Backup Control Center Task Force. Several members of that task force are also serving on the SAR DT. The goal of this effort is to start the standards effort at the time that the draft of the OC study is available. The project schedule supports this timing.			
IRC Standards Review Committee		<input checked="" type="checkbox"/>	The SRC would suggest that the SAR be clear that it will be a complete review of the subject requirements: to include the addition, deletion and modification of requirements as agreed to by public consensus and not be limited to the "TO DO LIST" identified in this draft.
Response: The SAR DT agrees that the needs of the entire industry will be reviewed and considered rather than only addressing perceived deficiencies.			
Midwest ISO, Inc.		<input checked="" type="checkbox"/>	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.
Response: The SAR DT agrees that the needs of the entire industry will be reviewed and considered rather than only addressing perceived deficiencies.			
Entergy Services, Inc.		<input checked="" type="checkbox"/>	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.

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Question #2			
Commenter	Yes	No	Comment
			<p>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".</p> <p>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.</p> <p>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 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.</p> <p>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.</p> <p>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.</p>
<p>Response:</p> <p>After discussion the SAR DT has decided to delete COM-001 from this SAR. COM-001 deals with communications in a generic sense and does not specifically relate to backup facilities. Consideration for communications support explicitly for backup facilities will be included in the scope of this SAR.</p> <p>The SAR DT agrees with the comment on certification standards and have removed this reference from the SAR.</p> <p>The NOPR must be taken into consideration when drafting this Standard since it is occurring now. When the final FERC ruling is issued, changes may be necessary if it differs significantly from the NOPR input.</p> <p>The SAR DT is going to work closely with the OC Backup Control Center Task Force. Several members of that task force are also serving on the SAR DT. The goal of this effort is to start the standards effort at the time that the draft of the OC study is available. The project schedule supports this timing.</p> <p>The SAR DT will review whether the backup requirements in other Standards will need to be consolidated into this one. The BFSDT will only consider what requirements are necessary for reliable system operations.</p>			

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Question #2			
Commenter	Yes	No	Comment
<p>The SAR DT does not intend to change other Standards. If appropriate, the BFSDT will relocate backup requirements from other Standards and include them in this Standard. The other Standards could then be updated to remove the redundant requirements.</p>			
<p>NPCC CP9 Reliability Standards Working Group NSTAR Electric Hydro One Networks Inc.</p>		<input checked="" type="checkbox"/>	<p>NPCC participating members (ISO-NE) (NSTAR) (Hydro One Networks) believe the Scope is too open ended and removal of the word "full" from the phrase "full backup facility" would be suggested.</p> <p>Also, since Version 0, NPCC participating members 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.</p>
<p>Response:</p> <p>The word "Full" only exists in Appendix B that is now listed as consideration only and not mandatory changes. It is possible (as pointed in several comments) that alternatives may exist to meet the requirements without requiring a "full" backup or complete duplication of a Primary Control Center.</p> <p>After discussion the SAR DT has decided to delete COM-001 from this SAR. COM-001 deals with communications in a generic sense and does not specifically relate to backup facilities. Consideration for communications support explicitly for backup facilities will be included in the scope of this SAR.</p>			
<p>American Transmission Company</p>		<input checked="" type="checkbox"/>	<p>ATC requests more detail on the scope and nature of the backup capability study identified in the "Brief Description" section of the SAR.</p> <ol style="list-style-type: none"> 1)What specifically is going to be asked in the study? <ol style="list-style-type: none"> 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? <ol style="list-style-type: none"> 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? <p>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.</p> <p>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?</p> <p>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.</p>

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Question #2			
Commenter	Yes	No	Comment
			<p>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.</p> <p>EOP-008-0</p> <p>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."</p> <p>In the Standards Authorization Request Form, the Applicability section asks whether the reliability entity should be the TSP and not the TOP:</p> <p>Question: Isn't the reliability entity the TSP and not the TO as per the FM?</p> <p>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.</p> <p>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.</p> <p>Similarly, any new requirements should clearly state who is responsible for performing that function.</p>

Consideration of Comments on 1st Draft of Backup Facilities SAR

Question #2			
Commenter	Yes	No	Comment
			<p>COM-001-0</p> <p>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.</p> <p>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".</p>
<p>Response:</p> <p>The SAR DT is going to work closely with the OC Backup Control Center Task Force. Several members of that task force are also serving on the SAR DT. The goal of this effort is to start the standards effort at the time that the draft of the OC study is available. The project schedule supports this timing.</p> <p>Generator Operator & Distribution Provider functions are contained in the NERC Functional Model but were only pertinent to COM-001 as per the FERC NOPR referenced in Appendix B. After discussion the SAR DT has decided to delete COM-001 from this SAR. COM-001 deals with communications in a generic sense and does not specifically relate to backup facilities. Consideration for communications support explicitly for backup facilities will be included in the scope of this SAR.</p> <p>The SAR DT discussed the applicability of the TSP and MP to this SAR and decided that they were not applicable entities in this regard. We believe that the coverage provided by the RC, BA and TOP should be sufficient to cover the need for control center backup.</p> <p>The SAR DT agrees that any associated standards that may be affected by this project will be identified in the SAR.</p> <p>EOP-008:</p> <ol style="list-style-type: none"> 1) The SAR DT agrees that the SDT should consider changing the title and purpose of EOP-008 2) The SAR DT agrees that individual requirements should be associated with the responsible entity. 			
Kansas City Power & Light Company		<input checked="" type="checkbox"/>	<p>There are no bounds to the scope of the project.</p> <p>COM-001</p> <p>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.</p> <p>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.</p>

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Question #2			
Commenter	Yes	No	Comment
			<p>The comments under "VO Industry Comments" and "VRF Comments" are not specific enough to respond to.</p> <p>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.</p>
<p>Response: The SAR DT has made changes to the content of the SAR that are believed to have clarified the scope of the project.</p> <p>After discussion the SAR DT has decided to delete COM-001 from this SAR. COM-001 deals with communications in a generic sense and does not specifically relate to backup facilities. Consideration for communications support explicitly for backup facilities will be included in the scope of this SAR.</p> <p>Appendix B is an informative attachment that contains material for consideration in the standards revision process. It should not be considered to contain mandatory changes to the standard.</p>			
Tennessee Valley Authority		<input checked="" type="checkbox"/>	<p>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?</p>
<p>Response: The SAR DT has made changes to the content of the SAR that are believed to have clarified the scope of the project.</p> <p>After discussion the SAR DT has decided to delete COM-001 from this SAR. COM-001 deals with communications in a generic sense and does not specifically relate to backup facilities. Consideration for communications support explicitly for backup facilities will be included in the scope of this SAR.</p>			
Xcel Energy – NSP		<input checked="" type="checkbox"/>	<p>Need to address that communication facilities should be compatible. For primary communciations we are there just by evolution, but back-up communciations could easily be diverse, especially at the Reliability Coordinator level.</p>
<p>Response: Any considerations for compatibility of communications facilities should be considered by the SDT We believe that the SAR as revised has sufficient flexibility to cover this issue.</p>			
Independent Electricity System Operator		<input checked="" type="checkbox"/>	<p>(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.</p> <p>(2) If COM-001-1 is to be revised, then we offer the following suggestions:</p> <p>(i) Since Version 0, we have recommended that the NERCnet users be removed from the Applicability</p>

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Question #2			
Commenter	Yes	No	Comment
			<p>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.</p> <p>(ii) R1.2: Entities shall provide adequate and reliable telecommunications facilities to ensure the exchange of interconnection and operating information.</p> <p>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.</p> <p>(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.</p> <p>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.</p> <p>(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.</p> <p>We have concerns regarding how R4 would be monitored for compliance.</p> <p>(v) R6: Each NERCNet User Organization shall adhere to the requirements in Attachment 1-COM-001-0, "NERCNet Security Policy".</p> <p>We recommend R6 be removed from the COM-001 requirements as it is considered general terms for completing the NERCnet application.</p> <p>(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.</p>

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Question #2			
Commenter	Yes	No	Comment
<p>Response: The SAR DT is going to work closely with the OC Backup Control Center Task Force. Several members of that task force are also serving on the SAR DT. The goal of this effort is to start the standards effort at the time that the draft of the OC study is available. The project schedule supports this timing.</p> <p>The SAR DT agrees that any associated standards that may be affected by this project will be identified in the SAR.</p> <p>After discussion the SAR DT has decided to delete COM-001 from this SAR. COM-001 deals with communications in a generic sense and does not specifically relate to backup facilities. Consideration for communications support explicitly for backup facilities will be included in the scope of this SAR.</p>			
MISO, IPL, JDRJC Associates	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	The Brief Description provides no bounds on the scope of the study or project. Expected cost, duration, participants, etc.
<p>Response: The SAR DT has made changes to the content of the SAR that are believed to have clarified the scope of the project.</p>			
PUD #2 of Grant County	<input checked="" type="checkbox"/>		The scope seems appropriate, but I am afraid that it may create an overly burdensome standard during the drafting process.
<p>Response: The SAR DT appreciates your comments and concerns and will concentrate on only what is required for reliable system operations.</p>			
Salt River Project	<input checked="" type="checkbox"/>		The scope appears reasonable in order to provide measurable requirements. Please define the acronym "VRF" that appears as comments in the To Do List.
<p>Response: VRF = Violation Risk Factor. Each standard has a VRF assigned that represents the impact of non-compliance will have on grid reliability. The Violation Risk Factors would be used for the initial basis for determining enforcement action for violations.</p>			
WECC Reliability Coordination Comments Work Group	<input checked="" type="checkbox"/>		<p>Please define the acronym VRF that appears in the To Do List.</p> <p>While we agree with the scope of the project, we feel that clarification of terms is necessary to facilitate an improved standard.</p> <p>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?</p> <p>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.</p>
<p>Response: VRF = Violation Risk Factor. Each standard has a VRF assigned that represents the impact of non-compliance will have on grid reliability. The Violation Risk Factors would be used for the initial basis for determining enforcement action for violations.</p> <p>The word "Full" only exists in Appendix B that is now listed as consideration only and not mandatory changes. It is possible (as pointed in several comments) that alternatives may exist to meet the requirements without requiring a "full" backup or complete duplication of a Primary Control Center.</p>			

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Question #2			
Commenter	Yes	No	Comment
The terms Independent and Prolonged (as used in Appendix B) will be further defined by the SDT as appropriate with regard to backup control centers.			
Manitoba Hydro			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.
<p>Response: CESDT = Compliance Elements Standards Drafting Team. (This team added measures and compliance elements to the Version 0 standards that were incomplete when approved.)</p> <p>The SAR DT is going to work closely with the OC Backup Control Center Task Force. Several members of that task force are also serving on the SAR DT. The goal of this effort is to start the standards effort at the time that the draft of the OC study is available. The project schedule supports this timing.</p> <p>The timeline for the completion of this project is included in the Reliability Standards Development Work Plan 2007 – 2009 and therefore does not need to be included in the SAR. The estimated completion date shown in the work plan for the completion of balloting on the revised standard is 4Q08.</p>			
Southern Company Services, Inc.	<input checked="" type="checkbox"/>		
American Electric Power	<input checked="" type="checkbox"/>		
Progress Energy Carolinas	<input checked="" type="checkbox"/>		
Public Service Commission of SC	<input checked="" type="checkbox"/>		
Entergy Services, Inc.	<input checked="" type="checkbox"/>		

Consideration of Comments on 1st Draft of Backup Facilities 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.

Summary Consideration: Based on stakeholder comments, the drafting team made the following changes to the SAR:

- Clarified that the work of the Operating Committee's Backup Control Center Task Force study will be used as an input to the development of the standard's requirements. The goal of this effort is to start the standards effort at the time that the draft of the OC study is available. The project schedule supports this timing.
- Removed COM-001 from the list of standards addressed by the SAR. COM-001 deals with communications in a generic sense and does not specifically relate to backup facilities. Consideration for communications support explicitly for backup facilities will be included in the scope of this SAR.
- Revised the default text in the 'Applicability' section of the SAR to include verbiage from Functional Model v3 as opposed to v2.
- Modified the applicability section of the SAR to include the Transmission Owner and clarified that the Transmission Owner should be considered as an applicable functional entity if it is operating a control center that is critical to Bulk Power System reliability but not registered as a Transmission Operator.
- Added language to clarify that the intent of the standard is to emphasize the continuation of needed functionality regardless of the manner in which it is achieved.

Question #3			
Commenter	Yes	No	Comment
NSTAR Electric ISO New England	<input checked="" type="checkbox"/>		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?
<p>Response: The SAR DT is going to work closely with the OC Backup Control Center Task Force. Several members of that task force are also serving on the SAR DT. The goal of this effort is to start the standards effort at the time that the draft of the OC study is available. The project schedule supports this timing.</p>			
IRC Standards Review Committee			<p>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 make that decision?</p> <p>The SAR requestor should be more sensitive to the fact that these new standards will be formal mandatory requirements backed by the federal government. The idea that current requirements are unclear and ambiguous is no reason to write a proposal that is just as unclear and ambiguous.</p> <p>Note that this 'question' asks for input and yet includes a YES and NO box. Please take more care in the proposal.</p>
<p>Response: The SAR DT is going to work closely with the OC Backup Control Center Task Force. Several members of that task force are also serving on the SAR DT. The goal of this effort is to start the standards effort at the time that the draft of the OC study is available. The project schedule supports this timing.</p>			

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Question #3			
Commenter	Yes	No	Comment
The SAR DT has made changes to the content of the SAR that are believed to have clarified the scope of the project.			
Hydro One Networks Inc.		<input checked="" type="checkbox"/>	<p>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?</p> <p>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.</p>
<p>Response: The SAR DT is going to work closely with the OC Backup Control Center Task Force. Several members of that task force are also serving on the SAR DT. The goal of this effort is to start the standards effort at the time that the draft of the OC study is available. The project schedule supports this timing.</p> <p>After discussion the SAR DT has decided to delete COM-001 from this SAR. COM-001 deals with communications in a generic sense and does not specifically relate to backup facilities. Consideration for communications support explicitly for backup facilities will be included in the scope of this SAR.</p> <p>The SAR DT has made changes to the content of the SAR that are believed to have clarified the scope of the project.</p>			
NPCC CP9 Reliability Standards Working Group			<p>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?</p> <p>NPCC participating members have also expressed concern 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</p>

Consideration of Comments on 1st Draft of Backup Facilities SAR

Question #3			
Commenter	Yes	No	Comment
			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.
<p>Response: The SAR DT is going to work closely with the OC Backup Control Center Task Force. Several members of that task force are also serving on the SAR DT. The goal of this effort is to start the standards effort at the time that the draft of the OC study is available. The project schedule supports this timing.</p> <p>After discussion the SAR DT has decided to delete COM-001 from this SAR. COM-001 deals with communications in a generic sense and does not specifically relate to backup facilities. Consideration for communications support explicitly for backup facilities will be included in the scope of this SAR.</p> <p>The SAR DT has made changes to the content of the SAR that are believed to have clarified the scope of the project.</p>			
Midwest ISO, Inc.	<input checked="" type="checkbox"/>		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.
<p>Response: Any considerations for compatibility of communications facilities should be considered by the SDT We believe that the SAR as revised has sufficient flexibility to cover this issue.</p>			
Southern Company Services, Inc.			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.
<p>Response: This is an important point and will be considered during the standard drafting phase by the SDT in their consideration of the implementation period.</p>			
American Transmission Company	<input checked="" type="checkbox"/>		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.

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Question #3			
Commenter	Yes	No	Comment
			<p>The following comment is on the SAR's form.</p> <p>Section: Reliability Functions</p> <p>Function: Market Operator</p> <p>Existing language: Integrates energy, capacity, balancing, and transmission resources to achieve an economic, reliability-constrained dispatch.</p> <p>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.</p> <p>Suggested language:</p> <p>Integrates energy, capacity, balancing, and transmission resources to achieve a reliability-constrained dispatch.</p>
<p>Response: The individuals selected by the SC for the SAR DT are experienced with operations, facilities, and communications. The membership of the SDT will be reviewed by the SC when the work is ready to progress to the standards writing phase.</p> <p>The SAR has been revised to include verbiage from Functional Model v3 as opposed to v2 text that appears in the original SAR and that should help to clear up any confusion with applicable entity assignment. The Market Operator is not an applicable entity for this standard.</p>			
PUD #2 of Grant County	<input checked="" type="checkbox"/>		<p>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.</p>
<p>Response: This is an important point and will be considered by the SDT during the standard drafting phase.</p>			
Progress Energy Carolinas	<input checked="" type="checkbox"/>		<p>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.</p>
<p>Response: After discussion the SAR DT has decided to delete COM-001 from this SAR. COM-001 deals with communications in a generic sense and does not specifically relate to backup facilities. Consideration for communications support explicitly for backup facilities will be included in the scope of this SAR.</p>			
Manitoba Hydro			<p>COM-001-0 and -1 R1 what is "adequate", needs to be defined. "Interconnection and operating information",</p>

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Question #3			
Commenter	Yes	No	Comment
			<p>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".</p> <p>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 VRF's with current ballot on Version 0 VRF and proposed VRF's for Version 1, as appropriate.</p>
<p>Response: After discussion the SAR DT has decided to delete COM-001 from this SAR. COM-001 deals with communications in a generic sense and does not specifically relate to backup facilities. Consideration for communications support explicitly for backup facilities will be included in the scope of this SAR.</p> <p>Clarification of the EOP-008 standard along the lines suggested by this comment is within the scope of the SAR and would be undertaken by the standard drafting team.</p> <p>Existing and approved violation risk factors will be taken into account as appropriate by the SDT.</p>			
Independent Electricity System Operator		<input checked="" type="checkbox"/>	<p>(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.</p> <p>(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.</p>
<p>Response: The study team referred to in the SAR is the Backup Control Center Task Force. The task force was authorized by the NERC Operating Committee to develop the concepts of backup control and to provide the technical basis for developing the backup standards. The task force report will be available to the Standards Drafting Team. The information from the report will be used by the standard drafting team as one of the inputs when drafting the standard. Five members of the task force are also members of the SAR drafting team. This provides close liaison between the study group and the drafting team.</p> <p>The SAR Drafting Team agrees that in some cases (as described in the Brief Description section of the revised SAR) the Transmission Owner should be considered as an applicable functional entity to deal with the situation where Transmission Owners are operating control centers</p>			

Consideration of Comments on 1st Draft of Backup Facilities SAR

Question #3			
Commenter	Yes	No	Comment
<p>that are critical to Bulk Power System reliability but are not registered as Transmission Operators. The SAR has been revised accordingly and a question on this subject has been posted for the re-issuance of the SAR.</p>			
Salt River Project	<input checked="" type="checkbox"/>		<p>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.</p> <p>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?</p>
<p>Response: Clarification of the EOP-008 standard along the lines suggested by this comment is within the scope of the SAR and would be undertaken by the standard drafting team.</p> <p>Issues such as raised here in part 2 of your comment are not within the scope of this SAR DT.</p>			
Bonneville Power Administration	<input checked="" type="checkbox"/>		<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>
<p>Response: The SAR Drafting Team agrees that in some cases (as described in the Brief Description section of the revised SAR) the Transmission Owner should be considered as an applicable functional entity to deal with the situation where Transmission Owners are operating control centers that are critical to Bulk Power System reliability but are not registered as Transmission Operators. The SAR has been revised accordingly and a question on this subject has been posted for the re-issuance of the SAR.</p> <p>Critical equipment such as UPS will be considered at the standards drafting stage of this project.</p> <p>After discussion the SAR DT has decided to delete COM-001 from this SAR. COM-001 deals with communications in a generic sense and does not specifically relate to backup facilities. Consideration for communications support explicitly for backup facilities will be included in</p>			

Consideration of Comments on 1st Draft of Backup Facilities SAR

Question #3			
Commenter	Yes	No	Comment
the scope of this SAR.			
Xcel Energy – NSP	<input checked="" type="checkbox"/>		Review training requirements to insure consistency and adequacy. Response: Training is an important item and it will be considered.
Entergy Services, Inc.			<p>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?</p> <p>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 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.</p>
<p>Response: After discussion the SAR DT has decided to delete COM-001 from this SAR. COM-001 deals with communications in a generic sense and does not specifically relate to backup facilities. Consideration for communications support explicitly for backup facilities will be included in the scope of this SAR.</p> <p>The intent of the project is to emphasize the continuation of needed functionality regardless of the manner in which it is achieved.</p> <p>Clarification of the EOP-008 standard along the lines suggested by this comment is within the scope of the SAR and would be undertaken by the standard drafting team.</p> <p>Review of VRF is required of all standard drafting teams.</p>			
Tennessee Valley Authority		<input checked="" type="checkbox"/>	
WECC Reliability Coordination Comments Work Group		<input checked="" type="checkbox"/>	

Consideration of Comments on 1st Draft of Backup Facilities SAR

Question #3			
Commenter	Yes	No	Comment
ITC Transmission			No comment.
Entergy Services, Inc.			We have no additional revisions at this time.
American Electric Power			None identified at this time.
Kansas City Power & Light Company			This does not require a yes/no response. No other comments.
Public Service Commission of SC			None identified.
MISO, IPL, JDRJC Associates			This does not appear to be a yes-no question.