Individual or group. (18 Responses)
Name (9 Responses)
Organization (9 Responses)
Group Name (9 Responses)
Lead Contact (9 Responses)
Question 1 (18 Responses)
Question 1 Comments (18 Responses)
Question 2 (18 Responses)
Question 2 Comments (18 Responses)
Question 3 (18 Responses)
Question 3 Comments (18 Responses)
Question 4 (18 Responses)
Question 4 Comments (18 Responses)
Question 5 (0 Responses)
Question 5 Comments (18 Responses)
Question 6 (0 Responses)
Question 6 Comments (18 Responses)

Group
SERC OC Standards Review Group
Jim Case
Yes
No
We do not believe that it is possible to develop a "one size fits all" methodology.
Yes
No
We think that "critical facilities" are self evident within Requirement R2. The word "critical" is unnecessary in this context since the facilities in question are fully described in the parenthetical statement following the word "facilities". Any further definition seems likely to inadvertently limit the set of facilities intended to be covered by this requirement. It is our view that the SDT did not intend this requirement to connect with similar requirements in the Critical Infrastructure Protection standards and that 'critical facilities' is not intended to be the equivalent of Critical Assets. We request that the SDT validate our view.
Each Reliability Coordinator (RC) should know the status of facilities in adjacent RC areas that impact its RC area.
"The comments expressed herein represent a consensus of the views of the above named members of the SERC OC Standards Review group only and should not be construed as the position of SERC Reliability Corporation, its board or its officers."
Individual
Kirit Shah
Ameren
Yes
Making sure correct facilities are included in wide area view is important. Would suggest that we not use "critical" but reserve that term for only those facilities that are likely or lead to cascade, wide-are voltage collapse, interconnection instability, et al. What the SAR should describe is Operationally Significant facilities, of which "Critical facilities" would be a subset.
No
APPA's suggestion implies that there is always some analytic way to identify these facilities. As Entergy describes below, operators may need to identify facilities outside of an established rigorous study process. It would be less reliable to limit the number/scope to be covered simply because it didn't fit a rigorous methodology, data, and procedure.

Yes	
Yes	
Would suggest that we not use "critical" but reserve that term for only those facilities that are likely or lead to cascade, wide-are voltage collapse, interconnection instability, et al. What the SAR should describe is Operationally Significant facilities, of which "Critical facilities" would be a subset.	
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Group	
Northeast Power Coordinating Council	
Guy Zito	
No	
There is a need to develop measures for each requirement, but do not agree with defining the term "Critical Facilities". We do not disagree with the intent; however, we disagree with the need to develop a definition. In general, definitions are applicable and valid within the context of the framework or document to which it applies. For example, a facility if removed from service may be critical for SOL, but not critical for IROL; a facility may be critical for SOL and IROL, but not critical for balancing control; a facility may be critical for SOL and IROL, but not for failing to have its faults cleared properly; a facility may be critical if its cyber access is invaded, but not for SOL or IROL, etc. There are at least several classes of facilities to which we can assign the term "critical", but they are applicable under different conditions: a. A facility is critical for protection system design if a fault not cleared properly can result in adverse impact on the interconnected system; b. A facility is critical for transmission system operation if its removal from service affects SOL and or IROL (requiring a reduction in the SOL or IROL); c. A facility is critical for balancing control if its unavailability or malfunction results in an inability to correct ACE or frequency excursion; d. A facility/device/component is critical if its unavailability or malfunction can result in a protection relay system not able to clear a fault, or initiate the intended corrective actions; e. A facility or asset is critical if cyber invasions or malicious acts can result in major interruptions to interconnected system control or reliability; To define the term "critical facilities" for SOL/IROL, even assuming it is doable for both limits, may not address the other situations listed above. Hence, there will likely need to be a series of defined terms for "critical facilities" for different applications, which is confusing and defeats the purpose of having a definition. Suggest the SAR proponent and/or the SAR DT to consider adopting an alternative approach to address the directive by putting the appropriate words in the affected standard requirements to stipulate the situational awareness requirements without defining the term, thereby addressing FERC's Directive to provide meaning to the term "critical facilities".	
No	
We do not agree with APPA's proposals, and agree with the need for a set of consistent continent-wide criteria as suggested by Entergy.	
Yes	
No	
Refer to our comments submitted to Question 1.	
The use of the phrase "could result in an SOL or IROL violation" is inappropriate. A facility that may be critical to a system's SOL/IROL when taken out of service may require a reduction in the SOL/IROL, but may not cause or result in the concerned system "violating" the SOL/IROL. There is an increasing trend to use the word "exceedance", since within the context of the IRO standards IROL may be temporarily exceeded, but there is no violation unless the magnitude of the exceedance is not corrected within Tv. With respect to what "critical facilities" (relating to R2) should be monitored in adjacent Reliability Coordinator Areas, we suggest the facilities whose status affect an RC area's IROL (or a TOP area's SOL) be put on the monitored list. This is the current approach in NPCC, and provides the triggering mechanism that an assessment be conducted to address the adverse impact of the facility's status on the IROL with adjustments applied as necessary. This list is also used in coordination of facility outage plans and schedules.	

Individual	
Jonathan Appelbaum	
The United Illuminating Company	
No	
UI Agrees with adding measures. UI Disagree with the need to define the term critical facilities and suggests the scope include removing the word "critical" from the requirement.	
No	
The word "critical" is not needed for this requirement. The RC should monitor all facilities whose failure, degradation, or disconnection can result in an IROL violation.	
No	
The word "critical" is not needed for this requirement. The RC should monitor all facilities whose failure, degradation, or disconnection can result in an IROL violation.	
No	
The word "critical" is not needed for this requirement. The RC should monitor all facilities whose failure, degradation, or disconnection can result in an IROL violation.	
Those facilities whose failure, degradation or disconnection could result in an IROL violation.	
Individual	
RoLynda Shumpert	
South Carolina Electric and Gas	
Yes	
Yes	
Yes	
Yes	
The SDT needs to be clear when defining the term Critical Facilties, so no confusion will arise between what consitutes Critcial Facilities versus what constitutes Critical Assets. The deliniation should be that: a) Critical Assets require additional secuirty, so that they will be available/functional whenever needed to operate the BES b)Critical Facilites require additional montioring, so that their availability will be known in case they are needed to mitigate an SOL/IROL violation. Critical Facilities should be defined to include only those assets whose failure could cause or contribute to SOL or IROL violation as stated in the current IRO-003-2 standard. This list of facilities should be considered dynamic as it will change based on the given system confiugration. For example, if a generator ramping up generation is the only operating procedure available to mitigate an IROL, then that generator should be considered a Critical Facility.	
Facilities that are specified in an operating procedure that acts as the sole procedure available to mitigate an IROL violation should be monitored in adjacent RC Areas.	
Individual	
Dan Rochester	
Independent Electricity System Operator	
No	
We agree with the need to develop measures for each requirement, but do not agree with defining the term "Critical Facilities" despite the FERC directive. The IESO is a member of the NPCC Region. The Region has long established a Critical Facility List for facilities which, if removed from service, may affect an adjacent system. In essence, NPCC has a list and the criteria and procedures in place to meet the intent of the FERC directive to enhance awareness not just local to a system but also on a wide-area perspective. We do not disagree with the intent; however, we disagree with the need to develop a definition. In general, definitions are applicable and valid within the context of the	

framework or document to which it applies. For example, a facility if removed from service may be critical for SOL but not critical for IROL; a facility may be critical for SOL and IROL but not critical for balancing control; a facility may be critical for SOL and IROL but not for failing to have its faults cleared properly; a facility may be critical if its cyber access is invaded but not for SOL or IROL, etc. There are at least several classes of facilities to which we can assign the term "critical" but they are applicable under different conditions: a. A facility is critical for protection system design if a fault not cleared properly can result in adverse impact on the interconnected system; b. A facility is critical for transmission system operation if its removal from service affects SOL and or IROL (requiring a reduction in the SOL or IROL); c. A facility is critical for balancing control if its unavailability or malfunction results in the inability to correct ACE or frequency excursion; d. A facility/device/component is critical if its unavailability or malfunction can result in the protection relay system not able to clear a fault or initiate the intended corrective actions; e. A facility or asset is critical if cyber invasions or malicious acts can result in major interruptions to interconnected system control or reliability; To define the term Critical Facilities for SOL/IROL, even assuming it is doable for both limits, may not address the other situations listed above. Hence, there will likely need to be a series of defined terms for Critical Facilities for different applications, which is confusing and defeats the purpose of having a definition. We suggest the SAR proponent and/or the SAR DT to consider adopting an alternative approach to address the directive by putting the appropriate words in the affected standards to stipulate the situation awareness requirements without defining the term. For example, we suggest that the SDT consider including in the scope of the SAR revising Requirement R2 of IRO-003-2 to obviate the need for a definition of "critical facilities". In essence, the definition of "critical facilities" is already localized in the requirement as evidenced by the clause "whose failure, degradation or disconnection could result in an SOL or IROL violation." We offer two possible revisions to R2 are as follows: Each Reliability Coordinator shall know the current status of all BES facilities whose failure, degradation or disconnection could result in an SOL or IROL violation. Reliability Coordinators shall also know the status of any facilities that may be required to assist area restoration objectives. OR Each Reliability Coordinator shall know the current status of all facilities it deems critical to BES reliability whose failure, degradation or disconnection could result in an SOL or IROL violation. Reliability Coordinators shall also know the status of any facilities that may be required to assist area restoration objectives.

No

Notwithstanding our comment on the need to have a defined term, we do not agree with APPA's proposal. Within the context of SOL/IROL, since the intent of the directive is to enhance awareness to cover an area wider than a PC or RC or TOP area, chances are the wide-area view may span over more than one Regional Entity's footprint. Facilities that may be critical to system operation (SOL/IROL in this case) know no artificial regional boundary; their status and/or operation can affect systems in other REs' footprint. The industry is moving toward developing continent-wide reliability standards and SOL and IROL are terms used in NERC standards and applicable to all responsible entities across the continent. This together with FERC's intent to (a) eliminate fill-in-the-blank standards and (b) define BPS to remove the different approaches taken by individual REs in defining BES, we do not see the merit of adopting a regional approach to determining critical facilities.

Yes

Again, notwithstanding our comment on the need to develop a definition, facilities that can be critical to SOL/IROL may change depending on the system condition. In Ontario, the IESO develops a list of facilities that are critical for different operating areas. Facilities that are not included in the list are deemed non-critical. However, when a non-critical facility together with another facility, critical or otherwise, is out of service, the non-critical facility may become critical. There are other conditions under which a non-critical facility may become critical. The requirements to address this directive need to have the flexibility to address these situations.

No

Please see our comments under Q1 for the reason of our disagreement.

First of all, we want to point out that "could result in an SOL or IROL violation" is inappropriate. A facility that may be critical to a system's SOL/IROL when taken out of service may require a reduction in the SOL/IROL, but may not cause or result in the concerned system "violating" the SOL/IROL. Further, there is an increasing trend to use the word "exceedance" since within the context of the IRO standards, IROL may be temporarily exceeded but there is no violation unless the magnitude of the exceedance is not corrected within Tv. With respect to what 'critical facilities' (relating to R2) should

be monitored in adjacent Reliability Coordinator Areas, we suggest the facilities whose status affect an RC area's IROL (or a TOP area's SOL) be put on the monitored list. This is the current approach adopted in IESO (and NPCC in general), and provides the triggering mechanism that an assessment be conducted to address the adverse impact of the facility's status on the IROL with adjustments applied as necessary. This list is also used in coordination of facility outage plans and schedules.

Individual
Greg
Rowland
Yes
No
We believe that the reliability standard should define the criteria, and the Reliability Coordinator should apply the criteria to determine "critical facilities".
Yes
Yes
With regards to what facilities should be monitored in adjacent RC Areas, strike the word "critical" in R2, because it's not needed and could cause confusion. Also need to strike SOL, and limit the requirement to facilities that could result in an IROL violation. If the RC is required to monitor everything in adjacent areas that "could result in an SOL violation", then the RC would be overwhelmed with far too much information. Each RC and TOP is monitoring its own SOLs, which is sufficient.
The phrase "critical facilities" creates potential confusion with the phrase "Critical Assets" which is used in the CIP standards. Monitoring for situational awareness is different from cyber protection; and we suggest using another term or phrase than "critical facilities".
Individual
Thad Ness
American Electric Power (AEP)
Yes
There should be consideration made to other references to "critical facilities" (i.e. PRC-023 and EOP-008). Should this SAR also consider those in scope? Will the definitions and criteria be the same or different?
No
AEP supports the idea of a widely available and transparent methodology, but we contend that this methodology is better developed at the Reliability Coordinators rather than NERC and the Regional Entities.
Yes
While we agree with the problem statement that conditions change necessitating updates to the list of critical facilities, we do caution that the list of "critical facilities" cannot be overly dynamic without any bounds.
Yes
Please see our comments to item number one above.
It may not be practical for each RC to monitor all adjacent "critical facility", but at a minimum they should be aware of and potentially monitor "critical facilities" at or near the border that could have an impact to IROL facilities.
Group
Southern Company
Andy Tillery
Yes

No
We do not believe that it is possible to develop a "one size fits all" methodology.
Yes
No
We think that "critical facilities" are self evident within Requirement R2. The word "critical" is unnecessary in this context since the facilities in question are fully described in the parenthetical statement following the word "facilities". Any further definition seems likely to inadvertently limit the set of facilities intended to be covered by this requirement. It is our view that the SDT did not intend this requirement to connect with similar requirements in the Critical Infrastructure Protection standards and that 'critical facilities' is not intended to be the equivalent of Critical Asset We request that the SDT validate our view.
Each Reliability Coordinator (RC) should know the status of facilities in adjacent RC areas that impact its RC area.
Individual
Richard Kafka
Pepco Holdings, Inc.
Yes
Yes
It is appropriate for the SDT to consider this suggestion, but it seems more appropriate for PCs or RCs to determine critical facilities.
No
This is unnecessary. Any facility could become "critical" given enough real-time contingencies or outages.
Yes
It is reasonable to consider developing a definition. We suggest ALR be used for guidance.
RCs already are required to coordinate with each other.
Group
MRO's NERC Standards Review Subcommittee
Carol Gerou
No
As stated in the Reliability Standards Development Procedure, "Measures are used to assess performance and outcomes for the purpose of determining compliance with the requirements ". Measures should give a Responsible Entity what types of proof of compliance that can be used, not the only types of proof of compliance that an entity can have as compliance proof. Please take this into consideration when adding measures. Do not agree with the suggestion of defining "critical asset", per se at the NERC level. As noted and stated in FERC Order 693, paragraph 914, FERC directs a criteria to define "critical facilities" and the best way is to define a "methodology" for the responsible entity to follow in determining critical facilities. Recommend that any definition for critical facilities not be included in CIP-002 through CIP-009. The methodology would only be used within this project only. The use of the word "critical" is confusing recommend replacing the word with "important", "vital", "crucial" or "essential" facility.
No
Do not agree with each Region establishing a methodology for defining what a "critical facility" is. There are too many MRRE's (Multiple Region Registered Entities) that would have to comply with up to 8 different Regions. The SDT should address this issue on behalf of NERC only. Through the NERC delegation agreements, Regions are to enforce NERC Standards through consistent enforcement, meaning each Region shall come to the same conclusion as the other, upon review of compliance

evidence. If there are 8 different methodologies, this will never be achieved.
No
System conditions should not play any part of what a "critical facility" is. Changing system conditions are related to section 215 of the Federal Power Act of 2005, where FERC defined the term "reliable operation" means operating the elements of the bulk-power system within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or cascading failures of such system will not occur as a result of a sudden disturbance, including a cybersecurity incident, or unanticipated failure of system elements. FERC Order 693, paragraph 914 states in the last sentence that "the ERO should consider the suggestion of APPA, Entergy and Xcel". The NSRS believes the best way is for NERC to publish a methodology requirement within this Standard.
No
Entities should be allowed to determine what facilities are deemed to be critical to their system. As stated by the NERC President, "everything cannot be a priority" and by casting a wide net, a definition of critical facility may bring too many items that are not truthfully, critical to the reliability of the BES. Recommend that the SDT provide a methodology.
Please consider this rewrite. Each Reliability Coordinator shall know the current status of all critical facilities whose failure, degradation or disconnection could result in an SOL or IROL violation. Reliability Coordinators shall provide adjacent RC Areas with information that could lead to an IROL.
Group
Dominion
Louis Slade, Jr.
Yes
Dominion agrees with the need to define "critical facilities;" however, we urge the SDT to consider words that convey the intent without being easily confused with "Critical Assets" as used in the CIP Standards.
No
Dominion does not believe that it is possible to develop a 'one size fits all' methodology and is more aligned with Entergy's position.
Yes
No
Dominion believes that "critical facilities" are self evident within Requirement R2. The word "critical" is unnecessary in this context since the facilities in question are fully described in the parenthetical statement following the word "facilities". Any further definition seems likely to inadvertently limit the set of facilities intended to be covered by this requirement. It is our view that the SDT did not intend this requirement to connect with similar requirements in the Critical Infrastructure Protection standards and that 'critical facilities' is not intended to be the equivalent of Critical Asset We request that the SDT validate our view.
Each Reliability Coordinator (RC) should know the status of facilities in adjacent RC areas that impact its RC area.
Group
Midwest ISO Standards Collaborators
Jason L. Marshall
No
While we agree that the FERC directives need to be addressed, we are concerned that this SAR has the potential to go too far and that the directives may not even be fully understood given context of the entire order. For instance, FERC is very clear in paragraph 616 (included below) that adding measures are up to the discretion of NERC. Furthermore, within the SAR paragraph 913 from Order 693 clearly states that NERC has already met the directive for adding measures. "In response to APPA's concern that NERC did not provide a Measure for each Requirement, we reiterate that it is in the ERO's discretion whether each Requirement requires a corresponding Measure. The ERO should

consider this issue through the Reliability Standards development process." We also disagree with the need to create criteria for critical facilities. Rather than create criteria, we believe the drafting team should focus their efforts on the need for a definition. Establishing criteria will result in a prescriptive definition of critical facilities that does not allow flexibility for differences in the characteristics of various RC footprints. Furthermore, it is contrary to the results-based standards development efforts that have been approved by the NERC BOT.

No

We do not agree with APPA's suggestion. Each RC footprint is unique and a one-size all approach is not appropriate. Furthermore, APPA's proposal deviates from NERC's results-based standards efforts as it focuses on how to meet the goal of a requirement and not what needs to be accomplished. APPA's proposal also could create security risks to the Bulk Electric System. Critical facilities should be classified as CEII information and should not be publicly available in general. Thus, it would be questionable to establish a methodology that is too transparent such that the general public could then ascertain what is critical and what is not. This could inadvertently play right into the hands of those wishing to harm our nation.

No

We agree with Entergy regarding the need for flexibility but disagree with the need for a criteria identified in the standard. Including the criteria focuses the standard on how to accomplish reliability goals and moves the standard away from defining what the reliability goal is. Defining universal criteria is diametrically opposed with the need for flexibility.

No

We are not convinced that a definition is needed but do agree that the drafting team should explore the need for a definition. However, the drafting team needs to carefully consider the impact of the definition on other standards. For instance, EOP-008-0 R1.3 includes the term critical facilities and that standard may need to be modified to capitalize the term so that it references that definition. Then again, it may not need to be referenced. The bottom line is that the drafting team simply needs to consider these types of impacts and make appropriate adjustments in other standards as necessary.

Any facilities that could impact the IROL or SOL should be monitored. This would include facilities outside of the RC footprint. However, we caution the drafting team in allowing a RC to define critical facilities in another RC's footprint. Doing this could result in conflicting critical facilities lists. For example, RC A may identify a facility in the RC B footprint that impacts one of its IROLs and call it critical. That same facility in RC B's footprint may not impact any IROLs and SOLs within its own footprint. Thus, RC B deems it not critical. This situation should be avoided.

Group

IRC Standards Review Committee

Ben Li

Yes

We agree with the general scope of the SAR to address the FERC directives, and to consider the specific industry comments mentioned in the Order. However, we are concerned that this SAR has the potential to go too far and that the directives may not be fully understood given context of the entire order. For instance, FERC is very clear in paragraph 616 (included below) that adding measures are up to the discretion of NERC. Furthermore, within the SAR paragraph 913 from Order 693 clearly states that NERC has already met the directive for adding measures. "In response to APPA's concern that NERC did not provide a Measure for each Requirement, we reiterate that it is in the ERO's discretion whether each Requirement requires a corresponding Measure. The ERO should consider this issue through the Reliability Standards development process." We also disagree with the need to create criteria to define the term "critical facilities", and the preconceived notion that this terms needs to be defined to address the FERC directives. Establishing criteria may result in a prescriptive definition of critical facilities that does not allow flexibility for differences in the characteristics of various RC footprints. Furthermore, it is contrary to the results-based standards development efforts that have been approved by the NERC BOT.

No

We do not agree with APPA's suggestion. Each RC footprint is unique and a one-size all approach is

not appropriate. Furthermore, APPA's proposal deviates from NERC's results-based standards concept as the proposal focuses on how to meet the goal of a requirement and not what needs to be accomplished. Further, the industry is moving toward developing continent-wide reliability standards, and SOL and IROL are terms used in NERC standards and are applicable to all responsible entities across the continent. This together with FERC's intent to (a) eliminate fill-in-the-blank standards and (b) define BPS to remove the different approaches taken by individual REs in defining BES, we do not see the merit of adopting a regional approach to determining critical facilities.
No
We agree with Entergy regarding the need for flexibility but disagree with the need for identifying criteria in the standard. Including the criteria focuses the standard on how to accomplish reliability goals and moves the standard away from defining what the reliability goal is. Defining universal criteria is diametrically opposed with the need for flexibility.
No
We disagree with the need to develop a definition. In general, definitions are applicable and valid within the context of the framework or document to which it applies. For example, a facility if removed from service may be critical for SOL but not critical for IROL; a facility may be critical for SOL and IROL but not critical for balancing control; a facility may be critical for SOL and IROL but not for failing to have its faults cleared properly; a facility may be critical if its cyber access is invaded but not for SOL or IROL, etc. There are at least several classes of facilities to which we can assign the term "critical" but they are applicable under different conditions: a. A facility is critical for protection system design if a fault not cleared properly can result in adverse impact on the interconnected system; b. A facility is critical for transmission system operation if its removal from service affects SOL and or IROL (requiring a reduction in the SOL or IROL); c. A facility is critical for balancing control if its unavailability or malfunction results in the inability to correct ACE or frequency excursion; d. A facility/device/component is critical if its unavailability or malfunction can result in the protection relay system not able to clear a fault or initiate the intended corrective actions; e. A facility or asset is critical if cyber invasions or malicious acts can result in major interruptions to interconnected system control or reliability; To define the term Critical Facilities for SOL/IROL, even assuming it is doable for both limits, may not address the other situations listed above. Hence, there will likely need to be a series of defined terms for Critical Facilities for different applications, which is confusing and defeats the purpose of having a definition. We suggest the SAR proponent and/or the SAR DT to consider adopting an alternative approach to address the directive by putting the appropriate words in the affected standards to stipulate the situation awareness requirements without defining the term.
First of all, we want to point out that "could result in an SOL or IROL violation" mat be inappropriate. A facility that may be critical to a system's SOL/IROL when taken out of service may require a reduction in the SOL/IROL, but may not cause or result in the concerned system "violating" the SOL/IROL. Further, there is an increasing trend to use the word "exceedance" since within the context of the IRO standards, IROL may be temporarily exceeded but there is no violation unless the magnitude of the exceedance is not corrected within Tv. We agree that facilities in adjacent RC areas which can impact IROLs and/or SOLs in another RC area should be monitored. However, we suggest cautions be exercised in developing standard language that would allow an RC to specify critical facilities in another RC's footprint. Doing this can result in conflicting critical facilities lists. For example, RC A may identify a facility in the RC B footprint that impacts one of its IROLs and call it critical. That same facility in RC B's footprint may not impact any IROLs and SOLs within its own footprint. Thus, RC B deems it not critical. This situation should be avoided. Caution should also be exercised to not overly expand the footprint of an RC. An RC should be able to see the portion of a neighboring RC footprint that has the potential to impact its footprint, although restricting it to only SOL/IROL exceedances/violations may not be sufficient. Likewise an RC needs to be able to see, including analyze, a portion of a neighboring RC footprint to ensure that what it does in its footprint doesn't adversely impact the neighboring RC footprint.
Individual
Jason Shaver
American Transmission Company
No
While we agree that the FERC directives need to be addressed, we are concerned that this SAR has

the potential to go too far and that the directives may not even be fully understood given context of the entire order. For instance, FERC is very clear in paragraph 616 (included below) that adding measures are up to the discretion of NERC. Furthermore, within the SAR paragraph 913 from Order 693 clearly states that NERC has already met the directive for adding measures. "In response to APPA's concern that NERC did not provide a Measure for each Requirement, we reiterate that it is in the ERO's discretion whether each Requirement requires a corresponding Measure. The ERO should consider this issue through the Reliability Standards development process." We also disagree with the need to create criteria for critical facilities. Rather than create criteria, we believe the drafting team should focus their efforts on the need for a definition. Establishing criteria will result in a prescriptive definition of critical facilities that does not allow flexibility for differences in the characteristics of various RC footprints. Furthermore, it is contrary to the results-based standards development efforts that have been approved by the NERC BOT.

No

We do not agree with APPA's suggestion. Each RC footprint is unique and a one-size all approach is not appropriate. Furthermore, APPA's proposal deviates from NERC's results-based standards efforts as it focuses on how to meet the goal of a requirement and not what needs to be accomplished. APPA's proposal also could create security risks to the Bulk Electric System. Critical facilities should be classified as CEII information and should not be publicly available in general. Thus, it would be questionable to establish a methodology that is too transparent such that the general public could then ascertain what is critical and what is not. This could inadvertently play right into the hands of those wishing to harm our nation.

No

We agree with Entergy regarding the need for flexibility but disagree with the need for a criteria identified in the standard. Including the criteria focuses the standard on how to accomplish reliability goals and moves the standard away from defining what the reliability goal is. Defining universal criteria is diametrically opposed with the need for flexibility.

No

We are not convinced that a definition is needed. The drafting team needs to carefully consider the impact of the definition on other standards. For instance, EOP-008-0 R1.3 includes the term critical facilities and that standard may need to be modified to capitalize the term so that it references that definition. ATC has some additional concerns with the delay on the existing work. We believe that the SDT should not address this issue but focus on its original purpose and goal.

ATC believes that this is an impossible situation to demonstrate compliance. We believe that this effort should be dropped and that the team should focus on its original SAR. No entity should be expected to show on a facility by facility bases (external to its footprint) why it has or has not been includes it in their model. An entity could be prevented from doing anything if because they will have to show why they included some facilities but also why other facilities were not included. In addition, in a compliance audit if the auditor disagreed with the justification they could still be potentially found non-compliant over a disagreement of the exclusion of a facility. Lastly, even if a entity could do this one time the constant addition or changes in system configuration would make continual justification of facility inclusion could be costly.

ATC believes that this SAR should not be given to this team because it will delay the work of the team.

Individual

L Zotter, C Hasha, S Jue, M Morais, S Myers

ERCOT ISO

Yes

ERCOT ISO supports comments submitted by the IRC/SRC.

No

ERCOT ISO supports comments submitted by the IRC/SRC.

No

ERCOT ISO supports comments submitted by the IRC/SRC.

No

ERCOT ISO supports comments submitted by the IRC/SRC.

ERCOT ISO supports comments submitted by the IRC/SRC and asserts a minor addition to the response to Question 5 in paragraph 3 by inserting the phrase 'especially beyond the boundaries of an Interconnection'. Therefore, ERCOT ISO submits: "First of all, we want to point out that "could result in an SOL or IROL violation" may be inappropriate. A facility that may be critical to a system's SOL/IROL when taken out of service may require a reduction in the SOL/IROL, but may not cause or result in the concerned system "violating" the SOL/IROL. Further, there is an increasing trend to use the word "exceedance" since within the context of the IRO standards, IROL may be temporarily exceeded but there is no violation unless the magnitude of the exceedance is not corrected within Tv. We agree that facilities in adjacent RC areas which can impact IROLs and/or SOLs in another RC area should be monitored. However, we suggest cautions be exercised in developing standard language that would allow an RC to specify critical facilities in another RC's footprint. Doing this can result in conflicting critical facilities lists. For example, RC A may identify a facility in the RC B footprint that impacts one of its IROLs and call it critical. That same facility in RC B's footprint may not impact any IROLs and SOLs within its own footprint. Thus, RC B deems it not critical. This situation should be avoided. Caution should also be exercised to not overly expand the footprint of an RC, especially beyond the boundaries of an Interconnection. An RC should be able to see the portion of a neighboring RC footprint that has the potential to impact its footprint, although restricting it to only SOL/IROL exceedances/violations may not be sufficient. Likewise an RC needs to be able to see, including analyze, a portion of a neighboring RC footprint to ensure that what it does in its footprint doesn't adversely impact the neighboring RC footprint."

Group

Western Electricity Coordinating Council

Linda Perez

Yes

We agree that measures should be associated with requirements. The criteria should be flexible but be comprehensive enough to include any facilities that have the potential to impact the BES. Further we suggest that the criteria need to be well defined and consider the likely adverse impact to the BES.

Yes

Our understanding of APPA's comment is that NERC and the RE will make transparent their methodology, make available the data types they used and make available the procedure each registered entity would use to determine their critical facilities. However if APPA's comment means that NERC and the RE will create the critical facilities list, we do not agree.

Yes

We understand and agree that as system conditions change a given facility may become critical and elevated to the critical facility list, but this would be difficult to manage and communicate in real time.

Yes

This is dependent on your ties with the adjacent RC. For example, the Western Interconnection only has DC ties with other RC's.

This may be related to the work that the CSO 706 SDT CIP 002-4 has done on creating a list of criteria for critical assets.

Group

Kansas City Power & Light

Jim Useldinger

Yes

Recommend not using the term "critical facilities" as that may cause confusion with the CIP Standards and "critical assets" and the FAC-003 Standard and "facilities deemed as critical" in the applicability section of FAC-003. Do not want to any designation here to reflect on the facilities identified by other Standards for their specific purposes.

Yes

No

Although it is true that changing operating conditions can result in increasing the importance for transmission facilities, it is not necessary to attempt to clasify facilities as critical on a dynamic basis. Alarm processing, processes for establishing flowgates, and contingency analysis applications are sufficient in alerting System Operators to operating conditions that are unfavorable and require mitigating Operator action.
Yes
No other comments.