UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

SYSTEM RESTORATION RELIABILITY STANDARDS	**)** **)** **)**	**Docket No. RM10-16-000**

COMMENTS OF THE NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION IN RESPONSE TO NOTICE OF PROPOSED RULEMAKING

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I. INTRODUCTION

The North American Electric Reliability Corporation ("NERC")[1] hereby provides these comments in response to the Federal Energy Regulatory Commission's ("FERC" or "Commission") Notice of Proposed Rulemaking ("NOPR")[2] regarding System Restoration Reliability Standards EOP-001-1 (Emergency Operations Planning), EOP-005-2 (System Restoration from Blackstart Resources), and EOP-006-2 (System Restoration Coordination).

In the NOPR, the Commission proposed to approve the three revised Reliability Standards. However, the Commission has requested additional information regarding several concerns with NERC's proposals. The proposed Reliability Standards require that plans, facilities and personnel are prepared to enable system restoration using designated blackstart resources. By this filing, NERC submits its response to the NOPR.

[1] The Federal Energy Regulatory Commission ("FERC" or "Commission") certified NERC as the electric reliability organization ("ERO") in its order issued on July 20, 2006 in Docket No. RR06-1-000. *North American Electric Reliability Corporation*, "Order Certifying North American Electric Reliability Corporation as the Electric Reliability Organization and Ordering Compliance Filing," 116 FERC ¶ 61,062 (July 20, 2006).
[2] *System Restoration Reliability Standards*, 133 FERC ¶ 61,161 (November 18, 2010) ("NOPR").

II. NOTICES AND COMMUNICATIONS

Notices and communications with respect to this filing may be addressed to:

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III. DISCUSSION

In a December 31, 2009 petition,[3] NERC requested Commission approval of three revised Reliability Standards: EOP-001-1— Emergency Operations Planning; EOP-005-2 — System Restoration from Blackstart Resources; and EOP-006-2 — System Restoration Coordination and approval of a new term, "Blackstart Resource". In addition, NERC requested the Commission to approve the concurrent retirement of five existing Reliability Standards: EOP-001-0 — Emergency Operations Planning; EOP-005-1 — System Restoration Plans; EOP-006-1 — Reliability Coordination — System Restoration; EOP-007-0 — Establish, Maintain,

[3] *See* NERC**,** *Petition of the North American Electric Reliability Corporation for Approval of Three Emergency Preparedness and Operations Reliability Standards and One New Glossary Term and for Retirement of Five Existing Reliability Standards and One Glossary Term*. Docket No. RM10-16-000 (December 31, 2009)

and Document a Regional Blackstart Capability Plan; and EOP-009-0 — Documentation of Blackstart Generating Unit Test Results, as well as the definition of "Blackstart Capability Plan" from the NERC Glossary of Terms, all of which are superseded by the proposed Reliability Standards EOP-001-1, EOP-005-2 and EOP-006-2.

A. "Unique Tasks"

In its petition for approval, NERC proposed Requirement R11 of Reliability Standard EOP-005-2, which requires that applicable entities "shall provide a minimum of two hours of System restoration training every two calendar years to their field switching personnel identified as performing *unique tasks* associated with the Transmission Operator's restoration plan that are outside of their normal tasks."[4] In the NOPR, the Commission expressed a concern that "unique tasks" is vague and that entities may not understand the meaning of the term. Therefore, the Commission requested comment on the intent behind the term and on whether guidance should be provided. The Commission also requested comment on whether such "unique tasks" should be identified in each Transmission Operator's restoration plan.

To concentrate industry resources where they can best serve reliability, NERC carefully tailored field operations personnel training requirements to apply only to personnel involved in performing "unique tasks" in restoration, as compared to their normal duties. The NERC Reliability Standard Review Guidelines provide, in part:

> If the standard uses terms that are included in the NERC Glossary of Terms Used in Reliability Standards, then the term must be capitalized when it is used in the standard. New terms should not be added unless they have a 'unique' definition when used in a NERC reliability standard. *Common terms that could be found in a college dictionary should not be defined and added to the NERC Glossary.*[5]

[4] NOPR at P 20 (*emphasis added*).
[5] *See* NERC Petition, Exh. E (Record Development of Proposed Reliability Standards) at 310 (as identified in the PDF version available on eLibrary on the FERC's Home Page (http://www.ferc.gov)).

NERC believes that "unique tasks" is a common term. Additionally, NERC did not intend that the term "unique tasks" would have any meaning beyond the definition found in any college dictionary.

NERC notes that the EOP-005-2 standard provides responsible entities the flexibility to define what, if any, "unique tasks" are required under the standard for a given restoration plan. NERC does not see any reliability benefit to requiring the responsible entity to identify unique tasks within its restoration plan. Under the proposed standard, training is required on unique tasks whether those specific tasks are identified in the plan or not; adding another requirement to link the requirement to provide specific training with the elements identified in the restoration plan adds complexity that is not needed, and would not lead to an improvement in reliability.

Where normal tasks are performed during restoration (*i.e.*, switching) such tasks are not considered unique as they are performed every day. However, tasks not included in the field switching person's normal duties (*i.e.*, operation of a synchroscope) would be considered unique. Field switching personnel do not use a synchroscope during normal operations; rather the synchroscope is only used when trying to connect one portion of the system to another portion of the system such as during a restoration effort. The use of a synchroscope, therefore, would be considered a "unique" task under Requirement R11. Given that the term was not intended to have any special meaning beyond the collegiate dictionary definition, the term is not qualified to be a defined term in the NERC Glossary.

For these reasons, NERC does not support requiring identification of "unique tasks" in each Transmission Operator's restoration plan as part of the standard. Accordingly, additional guidance as to the meaning of "unique tasks" is not required under the standard, although NERC

could promote the development of a guideline to aid registered entities in complying with Requirement R11.

B. Telecommunication Facility Testing

In the NOPR, the Commission proposes to require a modification to EOP-005-2 that addresses periodic testing of telecommunication facilities required to implement restoration plans. Consistent with Reliability Standard COM-001-1.1, and recommendation 26 of the U.S. – Canada report on the August 24, 2003 blackout,[6] the Commission proposed that testing of telecommunication facilities be part of the restoration plan, including standing hotline networks (or functional equivalents) to receive timely and accurate information.[7] In addition, the Commission proposed that testing be done more frequently than during annual drills, exercises or simulations, as required by currently effective Requirement R5 of EOP-005-1. FERC requested comment on these proposals.

NERC respectfully opposes modifying EOP-005-2 to require periodic testing of telecommunication facilities used specifically for restoration plans, because alternative communication facilities are not employed for restoration purposes. Restoration is typically carried out in a control room, where personnel use the same equipment employed in carrying out normal every day activities. While drills, training, and testing may be carried out in locations other than a control room, and "alternative" communication facilities may be required for such locations, those communication facilities are not used for restorations. Rather, NERC believes that the Commission's concern regarding testing for "alternative" communication facilities is

[6] *U.S.-Canada Power System Outage Task Force, Final Report on the August 14, 2003 Blackout in the United States and Canada: Causes and Recommendations* at 161 (April 2004) ("Blackout Report"), *available at* http://www.ferc.gov/industries/electric/indus-act/blackout.asp.
[7] NOPR at P 22.

covered under Reliability Standard COM-001-1.1, which requires testing of routine communication facilities on an on-going basis.[8]

Currently, the Reliability Coordination Standard Drafting Team ("RC SDT") has a project underway (Project 2006-06) to develop a set of revisions to COM-001 that will tighten the requirement to have communication capabilities between functional entities. These proposed revisions to COM-001 include monthly testing of "alternative" communication facilities. Given that COM-001-1.1, as written, applies to all communication facilities, NERC does not support additional testing of telecommunication facilities as part of a restoration plan.

C. System Restoration Coordination

In the NOPR, the Commission noted that proposed Reliability Standard EOP-005-2, Requirement R1.4, requires the Transmission Operator to identify each blackstart resource and its characteristics. Furthermore, the Commission noted that, while EOP-007-0 also requires the Regional Entity to maintain a database of blackstart resources, EOP-006-2 does not have a similar requirement for Reliability Coordinators. Therefore, the Commission requested comments on why the current EOP-007-0 requirement was not carried forward in proposed Reliability Standard EOP-006-2, and whether it would be beneficial to include a requirement that Reliability Coordinators maintain a blackstart resource database.

NERC acknowledges the importance of Reliability Coordinators having access to information regarding blackstart resources. However, NERC also notes that Requirement R16 of proposed Reliability Standard EOP-005-2 requires that a Generator Operator provide the results

[8] Reliability Standard COM-001-1.1, R2 provides: "R2. Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall manage, alarm, *test and/or actively monitor vital telecommunications facilities.* Special attention shall be given to emergency telecommunications facilities and equipment not used for routine communications." (*emphasis added*).

of blackstart tests within 30 days of a request by a Reliability Coordinator. Thus, under EOP-005-2, Reliability Coordinators have sufficient authority to request information needed to identify blackstart resources. Moreover, it is the Transmission Operator that maintains direct contact with the blackstart resources, in accordance with EOP-005-2. NERC therefore does not believe EOP-006-2 should be modified to require Reliability Coordinators to maintain a blackstart resource database.

Although Reliability Coordinators need information about the blackstart resources within its Reliability Coordinator area, it is not necessary to require that these resources be in a database. Requiring the Reliability Coordinator to develop and maintain a database of the blackstart resources in its Reliability Coordinator area would be an administrative requirement that would not improve reliability. Moveover, Requirement R16 provides the mechanism and authority for the Reliability Coordinator to get whatever information it needs from Generation Owners.

D. Restoration Plan Verification

In the NOPR, FERC noted that EOP-005-2, Requirement R6, requires each Transmission Operator to verify (through analysis of actual events, simulations or testing) that its restoration plan accomplishes its intended function. However, the Commission expressed concern that EOP-006-2 does not include a similar requirement for Reliability Coordinators, which FERC stated could have an impact on the quality of a Reliability Coordinator's planning. FERC requested comment on whether a requirement to verify through actual events or testing should apply to Reliability Coordinators.

While Reliability Coordinators must review the restoration plans of Transmission Operators within 30 days of receipt, pursuant to EOP-006-2, Requirement R5 and 5.1, FERC noted its concern that "no clear guidance is provided" regarding how a Transmission Operator should handle a situation where the Reliability Coordinator disapproves a Transmission Operator's plan.[9] FERC requested comment on how a Transmission Operator should proceed when its plan is rejected by a Reliability Coordinator.

The proposed EOP-005-2 standard applies primarily to Transmission Operators and Generator Operators. In addition, Reliability Coordinators are required to perform verification of Transmission Operator restoration plans, under EOP-006-2. Given that Reliability Coordinator restoration plans are essentially compilations of the restoration plans of their constituent Transmission Operators, NERC believes that it would be duplicative to also require verification of the same plans by the Reliability Coordinator.

In the event that a restoration plan is rejected by a Reliability Coordinator, the Reliability Coordinator should supply a reason(s) for its rejections as required by EOP-006-2, Requirement R5. The Transmission Operator should then have an opportunity to re-submit a revised restoration plan. NERC does not believe it is necessary to document these steps as requirements in a Reliability Standard as these steps mimic the routine coordination of actions between the Reliability Coordinator and its Transmission Operators.

E. Proposed Data Reporting Requirement

In the NOPR, the Commission proposed to direct the ERO to gather data and establish a database that can be accessed by Transmission Operators, Reliability Coordinators and the Commission regarding Transmission Operator and Reliability Coordinator system restoration

[9] NOPR at P 26.

drills, exercises and simulations.[10] The Commission also noted that "the collection of this data will assist the ERO and Commission in identifying the effectiveness of restoration plans, establishing best practices among transmission operators and reliability coordinators, and determining the affects on personnel performance."[11] Therefore, the Commission requested comment on "the proposed data collection including the benefits of the information to be provided in the proposed collection, the types of information proposed to be collected, and any potential burden of the proposed collection."[12]

While NERC appreciates the Commission's concern that system restoration drills, exercises, and simulations be evaluated, NERC also notes that formal debriefings are held after each required drill. Thus, it is unclear whether there is any additional reliability benefit over the debriefings that are currently proposed. NERC also questions whether developing such a database would direct industry resources where they can best serve reliability. Instead, NERC believes that under the proposed standards the Reliability Coordinator's review of restoration plans will achieve the same reliability purpose as the proposed database.

[10] NOPR at P 29.
[11] *Id*. at P 28.
[12] *Id*. at P 29.

IV. CONCLUSION

NERC respectfully requests that the Commission take action consistent with these comments when it issues its Final Rule regarding standards EOP-001-1, EOP-005-2, and EOP-006-2.

Respectfully submitted,

/s/ Willie L. Phillips, Jr.

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing document upon all parties listed on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, D.C. this 24th day of January, 2011.

/s/Willie L. Phillips, Jr.
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