

Comment Form — 2nd Draft of SAR for System Restoration and Blackstart

Please use this form to submit comments on the proposed SAR for System Restoration and Blackstart. Comments must be submitted by **March 9, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.com with the words "System Restoration SAR" in the subject line. If you have questions please contact Ed Dobrowolski at Ed.Dobrowolski@nerc.net or by telephone at 609-452-8060.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Jason Shaver	
Organization:	American Transmission Co.	
Telephone:	262 506 6885	
E-mail:	jshaver@atcllc.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs,
<input checked="" type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input checked="" type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Comment Form — 2nd Draft of SAR for System Restoration and Blackstart

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*

*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

Background Information:

This project involves upgrading the requirements in these four standards:

- EOP-005 — System Restoration Plans
- EOP-006 — Reliability Coordination – System Restoration
- EOP-007 — Establish, Maintain, and Document a Regional Blackstart Capability Plan
- EOP-009 — Documentation of Blackstart Generating Unit Test Results

The SAR drafting team posted the SAR for an initial comment period and stakeholders indicated agreement that there is a reliability-related need to upgrade the requirements in these four standards. Based on stakeholder comments, the SAR drafting team modified the SAR to improve clarity, and made the following significant changes:

- Updated the SAR form to reflect the terms used in the Functional Model V3 as directed by the Standards Committee and to reference the correct version of the standards
- Added more specificity to the 'Industry Need' and 'Brief Description' sections of the SAR
- Added language to clarify that the "To Do" list (renamed as an "Issues to be Addressed" list is a list of issues to consider in the refinement of the standards, not a list of modifications that must be made to the standards
- Modified the headings in "Standard Review Forms" to more clearly identify the source of the comments listed on those forms
- Added a copy of the "Standard Review Guidelines" to clarify the scope of modifications required to upgrade this set of standards and to identify the reference used by NERC staff in evaluating the quality of existing standards
- Added a new attachment to the SAR that includes additional issues that should be addressed during the refinement of the standards — these are issues raised by stakeholders during the first comment period for the System Restoration and Blackstart SAR.

The System Restoration and Blackout SAR Drafting Team would like to receive industry comments on Draft 2 of the SAR. Accordingly, we request that you include review the revised SAR, answer the questions on this form, and e-mail the form to sarcomm@nerc.com with the words "System Restoration SAR" in the subject line by **March 9, 2007**.

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

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

1. Do you agree with the revised scope of the proposed SAR?

Yes

No

Comments: The SAR must describe, at a high level, the projected role each of the selected entities will play. This information will provide the industry with a greater understanding of the SAR's impact and work direction.

2. The SAR drafting team has checked off a large number of responsible entities as being applicable entities. We have done this in order to provide sufficient flexibility to the eventual standard drafting team and due to the fact that system restoration and blackstart can potentially touch so many different functional areas of operations.

Do you agree that the TOP should be responsible for securing blackstart services?

Yes

No

Comments:

Depends:

The TOP is currently responsible for transporting energy supplied from the Black Start generator interconnection point to restore the transmission grid as a whole under the restoration services portion of the Transmission Tariff. The costs of planning for, and implementing this responsibility are currently reimbursed under the network transmission tariff.

If by "securing blackstart services" it is intended that the TOP must contract with generators or otherwise arrange with "Black Start Generators" to provide this capability, ATC cannot support this approach unless a mechanism is also provided that will allow the TOP to include any costs that might be incurred in transmission rates.

ATC, is willing to be responsible as the TOP to enter into agreements for Black Start Services with generators that are interconnected to ATC's transmission facilities, and anticipate making the necessary tariff filings or otherwise arrange for reimbursement for any costs incurred through the regional transmission organization.

If the Standard is eventually written that the TOP is responsible for "procuring" or "arranging" for the service, an adequate timeframe prior to implementation of the requirement must be allowed to pursue the necessary rate and other tariff approval together with the required agreements prior to this standard becoming enforceable.

Comment Form — 2nd Draft of SAR for System Restoration and Blackstart

3. The SAR DT has checked off a large number of responsible entities as being applicable entities. We have done this in order to provide sufficient flexibility to the eventual SDT and due to the fact that system restoration and blackstart can potentially touch so many different functional areas of operations.

Do you agree that a Generator Owner and/or Generator Operator should have a documented plan for non-blackstart units to be restarted after a blackout?

Yes

No

Comments:

4. Do you agree that the SAR is ready to move forward to the standards drafting stage?

Yes

No

Comments: See our comments in questions 1 and 2.

Comment Form — 2nd Draft of SAR for System Restoration and Blackstart

Please use this form to submit comments on the proposed SAR for System Restoration and Blackstart. Comments must be submitted by **March 9, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.com with the words "System Restoration SAR" in the subject line. If you have questions please contact Ed Dobrowolski at Ed.Dobrowolski@nerc.net or by telephone at 609-452-8060.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Jim Burns	
Organization:	Bonneville Power Administration, Transmission Services	
Telephone:	360-418-2331	
E-mail:	jwburns@bpa.gov	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs,
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input checked="" type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Comment Form — 2nd Draft of SAR for System Restoration and Blackstart

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*

*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

Background Information:

This project involves upgrading the requirements in these four standards:

- EOP-005 — System Restoration Plans
- EOP-006 — Reliability Coordination – System Restoration
- EOP-007 — Establish, Maintain, and Document a Regional Blackstart Capability Plan
- EOP-009 — Documentation of Blackstart Generating Unit Test Results

The SAR drafting team posted the SAR for an initial comment period and stakeholders indicated agreement that there is a reliability-related need to upgrade the requirements in these four standards. Based on stakeholder comments, the SAR drafting team modified the SAR to improve clarity, and made the following significant changes:

- Updated the SAR form to reflect the terms used in the Functional Model V3 as directed by the Standards Committee and to reference the correct version of the standards
- Added more specificity to the 'Industry Need' and 'Brief Description' sections of the SAR
- Added language to clarify that the "To Do" list (renamed as an "Issues to be Addressed" list is a list of issues to consider in the refinement of the standards, not a list of modifications that must be made to the standards
- Modified the headings in "Standard Review Forms" to more clearly identify the source of the comments listed on those forms
- Added a copy of the "Standard Review Guidelines" to clarify the scope of modifications required to upgrade this set of standards and to identify the reference used by NERC staff in evaluating the quality of existing standards
- Added a new attachment to the SAR that includes additional issues that should be addressed during the refinement of the standards — these are issues raised by stakeholders during the first comment period for the System Restoration and Blackstart SAR.

The System Restoration and Blackout SAR Drafting Team would like to receive industry comments on Draft 2 of the SAR. Accordingly, we request that you include review the revised SAR, answer the questions on this form, and e-mail the form to sarcomm@nerc.com with the words "System Restoration SAR" in the subject line by **March 9, 2007**.

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

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

1. Do you agree with the revised scope of the proposed SAR?

Yes

No

Comments:

2. The SAR drafting team has checked off a large number of responsible entities as being applicable entities. We have done this in order to provide sufficient flexibility to the eventual standard drafting team and due to the fact that system restoration and blackstart can potentially touch so many different functional areas of operations.

Do you agree that the TOP should be responsible for securing blackstart services?

Yes

No

Comments: It is important to consider the issue of security when documenting a cranking path. The TOP should never be required to disclose the entire cranking path to other entities, like the Gen Operator. The Gen Operator does not need to know the entire cranking path in order to ensure blackstart services.

3. The SAR DT has checked off a large number of responsible entities as being applicable entities. We have done this in order to provide sufficient flexibility to the eventual SDT and due to the fact that system restoration and blackstart can potentially touch so many different functional areas of operations.

Do you agree that a Generator Owner and/or Generator Operator should have a documented plan for non-blackstart units to be restarted after a blackout?

Yes

No

Comments: While a documented plan for the restarting of non-blackstart units is not necessary, it is important that testing of blackstart units proves that the unit is capable of starting the non-blackstart units.

4. Do you agree that the SAR is ready to move forward to the standards drafting stage?

Yes

No

Comments:

Comment Form — 2nd Draft of SAR for System Restoration and Blackstart

Please use this form to submit comments on the proposed SAR for System Restoration and Blackstart. Comments must be submitted by **March 9, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.com with the words "System Restoration SAR" in the subject line. If you have questions please contact Ed Dobrowolski at Ed.Dobrowolski@nerc.net or by telephone at 609-452-8060.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Steve Myers	
Organization:	ERCOT	
Telephone:	512-248-3077	
E-mail:	smyers@ercot.com	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input checked="" type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs, ISOs,
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background Information:

This project involves upgrading the requirements in these four standards:

- EOP-005 — System Restoration Plans
- EOP-006 — Reliability Coordination – System Restoration
- EOP-007 — Establish, Maintain, and Document a Regional Blackstart Capability Plan
- EOP-009 — Documentation of Blackstart Generating Unit Test Results

The SAR drafting team posted the SAR for an initial comment period and stakeholders indicated agreement that there is a reliability-related need to upgrade the requirements in these four standards. Based on stakeholder comments, the SAR drafting team modified the SAR to improve clarity, and made the following significant changes:

- Updated the SAR form to reflect the terms used in the Functional Model V3 as directed by the Standards Committee and to reference the correct version of the standards
- Added more specificity to the 'Industry Need' and 'Brief Description' sections of the SAR
- Added language to clarify that the "To Do" list (renamed as an "Issues to be Addressed" list is a list of issues to consider in the refinement of the standards, not a list of modifications that must be made to the standards
- Modified the headings in "Standard Review Forms" to more clearly identify the source of the comments listed on those forms
- Added a copy of the "Standard Review Guidelines" to clarify the scope of modifications required to upgrade this set of standards and to identify the reference used by NERC staff in evaluating the quality of existing standards
- Added a new attachment to the SAR that includes additional issues that should be addressed during the refinement of the standards — these are issues raised by stakeholders during the first comment period for the System Restoration and Blackstart SAR.

The System Restoration and Blackout SAR Drafting Team would like to receive industry comments on Draft 2 of the SAR. Accordingly, we request that you include review the revised SAR, answer the questions on this form, and e-mail the form to sarcomm@nerc.com with the words "System Restoration SAR" in the subject line by **March 9, 2007**.

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

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

1. Do you agree with the revised scope of the proposed SAR?

Yes

No

Comments:

2. The SAR drafting team has checked off a large number of responsible entities as being applicable entities. We have done this in order to provide sufficient flexibility to the eventual standard drafting team and due to the fact that system restoration and blackstart can potentially touch so many different functional areas of operations.

Do you agree that the TOP should be responsible for securing blackstart services?

Yes

No

Comments:

3. The SAR DT has checked off a large number of responsible entities as being applicable entities. We have done this in order to provide sufficient flexibility to the eventual SDT and due to the fact that system restoration and blackstart can potentially touch so many different functional areas of operations.

Do you agree that a Generator Owner and/or Generator Operator should have a documented plan for non-blackstart units to be restarted after a blackout?

Yes

No

Comments: All generators should know what their role is in a system restoration or blackstart effort. If they are on the blackstart initiation, such as serving as a black start resource or as a "next start" unit, they should have a documented plan included in the applicable regional or operational area black start plan. If they are not in the initiation stage of the effort, they should have a documented procedure of how and when they would be started and re-synchronized as the restoration effort progresses.

4. Do you agree that the SAR is ready to move forward to the standards drafting stage?

Yes

No

Comments:

Comment Form — 2nd Draft of SAR for System Restoration and Blackstart

Please use this form to submit comments on the proposed SAR for System Restoration and Blackstart. Comments must be submitted by **March 9, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.com with the words "System Restoration SAR" in the subject line. If you have questions please contact Ed Dobrowolski at Ed.Dobrowolski@nerc.net or by telephone at 609-452-8060.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Roger Champagne	
Organization:	Hydro-Québec TransÉnergie (HQT)	
Telephone:	514 289-2211, X 2766	
E-mail:	champagne.roger.2@hydro.qc.ca	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs,
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background Information:

This project involves upgrading the requirements in these four standards:

- EOP-005 — System Restoration Plans
- EOP-006 — Reliability Coordination – System Restoration
- EOP-007 — Establish, Maintain, and Document a Regional Blackstart Capability Plan
- EOP-009 — Documentation of Blackstart Generating Unit Test Results

The SAR drafting team posted the SAR for an initial comment period and stakeholders indicated agreement that there is a reliability-related need to upgrade the requirements in these four standards. Based on stakeholder comments, the SAR drafting team modified the SAR to improve clarity, and made the following significant changes:

- Updated the SAR form to reflect the terms used in the Functional Model V3 as directed by the Standards Committee and to reference the correct version of the standards
- Added more specificity to the 'Industry Need' and 'Brief Description' sections of the SAR
- Added language to clarify that the "To Do" list (renamed as an "Issues to be Addressed" list is a list of issues to consider in the refinement of the standards, not a list of modifications that must be made to the standards
- Modified the headings in "Standard Review Forms" to more clearly identify the source of the comments listed on those forms
- Added a copy of the "Standard Review Guidelines" to clarify the scope of modifications required to upgrade this set of standards and to identify the reference used by NERC staff in evaluating the quality of existing standards
- Added a new attachment to the SAR that includes additional issues that should be addressed during the refinement of the standards — these are issues raised by stakeholders during the first comment period for the System Restoration and Blackstart SAR.

The System Restoration and Blackout SAR Drafting Team would like to receive industry comments on Draft 2 of the SAR. Accordingly, we request that you include review the revised SAR, answer the questions on this form, and e-mail the form to sarcomm@nerc.com with the words "System Restoration SAR" in the subject line by **March 9, 2007**.

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

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

1. Do you agree with the revised scope of the proposed SAR?

Yes

No

Comments:

2. The SAR drafting team has checked off a large number of responsible entities as being applicable entities. We have done this in order to provide sufficient flexibility to the eventual standard drafting team and due to the fact that system restoration and blackstart can potentially touch so many different functional areas of operations.

Do you agree that the TOP should be responsible for securing blackstart services?

Yes

No

Comments:

3. The SAR DT has checked off a large number of responsible entities as being applicable entities. We have done this in order to provide sufficient flexibility to the eventual SDT and due to the fact that system restoration and blackstart can potentially touch so many different functional areas of operations.

Do you agree that a Generator Owner and/or Generator Operator should have a documented plan for non-blackstart units to be restarted after a blackout?

Yes

No

Comments: HQT agrees that a Generator Owner and/or Generator Operator should have a plan to be ready to re-start non-blackstart units after a blackout. This readiness for energization should also apply to all distributors and loads connected to the bulk electrical system (BES) as well.

However, a NERC standard requirement(s) to have a documented plan for generating units to be restarted after a blackout should be limited to the 'restoration plan participants' on the cranking path only. The cranking path to be developed in the restoration plan would include those units that must be started or resynchronized to support the integrity of the path.

4. Do you agree that the SAR is ready to move forward to the standards drafting stage?

Yes

No

Comments:

Comment Form — 2nd Draft of SAR for System Restoration and Blackstart

Please use this form to submit comments on the proposed SAR for System Restoration and Blackstart. Comments must be submitted by **March 9, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.com with the words "System Restoration SAR" in the subject line. If you have questions please contact Ed Dobrowolski at Ed.Dobrowolski@nerc.net or by telephone at 609-452-8060.

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

Background Information:

This project involves upgrading the requirements in these four standards:

- EOP-005 — System Restoration Plans
- EOP-006 — Reliability Coordination – System Restoration
- EOP-007 — Establish, Maintain, and Document a Regional Blackstart Capability Plan
- EOP-009 — Documentation of Blackstart Generating Unit Test Results

The SAR drafting team posted the SAR for an initial comment period and stakeholders indicated agreement that there is a reliability-related need to upgrade the requirements in these four standards. Based on stakeholder comments, the SAR drafting team modified the SAR to improve clarity, and made the following significant changes:

- Updated the SAR form to reflect the terms used in the Functional Model V3 as directed by the Standards Committee and to reference the correct version of the standards
- Added more specificity to the 'Industry Need' and 'Brief Description' sections of the SAR
- Added language to clarify that the "To Do" list (renamed as an "Issues to be Addressed" list is a list of issues to consider in the refinement of the standards, not a list of modifications that must be made to the standards
- Modified the headings in "Standard Review Forms" to more clearly identify the source of the comments listed on those forms
- Added a copy of the "Standard Review Guidelines" to clarify the scope of modifications required to upgrade this set of standards and to identify the reference used by NERC staff in evaluating the quality of existing standards
- Added a new attachment to the SAR that includes additional issues that should be addressed during the refinement of the standards — these are issues raised by stakeholders during the first comment period for the System Restoration and Blackstart SAR.

The System Restoration and Blackout SAR Drafting Team would like to receive industry comments on Draft 2 of the SAR. Accordingly, we request that you include review the revised SAR, answer the questions on this form, and e-mail the form to sarcomm@nerc.com with the words "System Restoration SAR" in the subject line by **March 9, 2007**.

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

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

1. Do you agree with the revised scope of the proposed SAR?

Yes

No

Comments:

2. The SAR drafting team has checked off a large number of responsible entities as being applicable entities. We have done this in order to provide sufficient flexibility to the eventual standard drafting team and due to the fact that system restoration and blackstart can potentially touch so many different functional areas of operations.

Do you agree that the TOP should be responsible for securing blackstart services?

Yes

No

Comments:

3. The SAR DT has checked off a large number of responsible entities as being applicable entities. We have done this in order to provide sufficient flexibility to the eventual SDT and due to the fact that system restoration and blackstart can potentially touch so many different functional areas of operations.

Do you agree that a Generator Owner and/or Generator Operator should have a documented plan for non-blackstart units to be restarted after a blackout?

Yes

No

Comments: Each generator owner and/or generator operator should typically have a plan to be ready to re-start after a trip or blackout, when the power system is reenergized and conditions warrant. This readiness for energization should also apply to all distributors and loads connected to the bulk electrical system (BES) as well.

However, a NERC standard requirement(s) to have a documented plan for generating units to be restarted after a blackout should be limited to the 'restoration plan participants' on the cranking path only. The cranking path to be developed in the restoration plan would include those units that must be started or resynchronized to support the integrity of the path.

4. Do you agree that the SAR is ready to move forward to the standards drafting stage?

Yes

No

Comment Form — 2nd Draft of SAR for System Restoration and Blackstart

Comments: Provided our comment in Q3 can be addressed in the final SAR that will be used by the SDT

Comment Form — 2nd Draft of SAR for System Restoration and Blackstart

Please use this form to submit comments on the proposed SAR for System Restoration and Blackstart. Comments must be submitted by **March 9, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.com with the words "System Restoration SAR" in the subject line. If you have questions please contact Ed Dobrowolski at Ed.Dobrowolski@nerc.net or by telephone at 609-452-8060.

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

Background Information:

This project involves upgrading the requirements in these four standards:

- EOP-005 — System Restoration Plans
- EOP-006 — Reliability Coordination – System Restoration
- EOP-007 — Establish, Maintain, and Document a Regional Blackstart Capability Plan
- EOP-009 — Documentation of Blackstart Generating Unit Test Results

The SAR drafting team posted the SAR for an initial comment period and stakeholders indicated agreement that there is a reliability-related need to upgrade the requirements in these four standards. Based on stakeholder comments, the SAR drafting team modified the SAR to improve clarity, and made the following significant changes:

- Updated the SAR form to reflect the terms used in the Functional Model V3 as directed by the Standards Committee and to reference the correct version of the standards
- Added more specificity to the 'Industry Need' and 'Brief Description' sections of the SAR
- Added language to clarify that the "To Do" list (renamed as an "Issues to be Addressed" list is a list of issues to consider in the refinement of the standards, not a list of modifications that must be made to the standards
- Modified the headings in "Standard Review Forms" to more clearly identify the source of the comments listed on those forms
- Added a copy of the "Standard Review Guidelines" to clarify the scope of modifications required to upgrade this set of standards and to identify the reference used by NERC staff in evaluating the quality of existing standards
- Added a new attachment to the SAR that includes additional issues that should be addressed during the refinement of the standards — these are issues raised by stakeholders during the first comment period for the System Restoration and Blackstart SAR.

The System Restoration and Blackout SAR Drafting Team would like to receive industry comments on Draft 2 of the SAR. Accordingly, we request that you include review the revised SAR, answer the questions on this form, and e-mail the form to sarcomm@nerc.com with the words "System Restoration SAR" in the subject line by **March 9, 2007**.

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

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

1. Do you agree with the revised scope of the proposed SAR?

Yes

No

Comments:

2. The SAR drafting team has checked off a large number of responsible entities as being applicable entities. We have done this in order to provide sufficient flexibility to the eventual standard drafting team and due to the fact that system restoration and blackstart can potentially touch so many different functional areas of operations.

Do you agree that the TOP should be responsible for securing blackstart services?

Yes

No

Comments:

3. The SAR DT has checked off a large number of responsible entities as being applicable entities. We have done this in order to provide sufficient flexibility to the eventual SDT and due to the fact that system restoration and blackstart can potentially touch so many different functional areas of operations.

Do you agree that a Generator Owner and/or Generator Operator should have a documented plan for non-blackstart units to be restarted after a blackout?

Yes

No

Comments: Each generator owner and/or generator operator should typically have a plan to be ready to re-start after a trip or blackout, when the power system is reenergized and conditions warrant. This readiness for energization should also apply to all distributors and loads connected to the bulk electrical system (BES) as well.

However, a NERC standard requirement(s) to have a documented plan for generating units to be restarted after a blackout should be limited to the 'restoration plan participants' on the cranking path only. The cranking path to be developed in the restoration plan would include those units that must be started or resynchronized to support the integrity of the path.

4. Do you agree that the SAR is ready to move forward to the standards drafting stage?

Yes

No

Comment Form — 2nd Draft of SAR for System Restoration and Blackstart

Comments: Provided our comment in Q3 can be addressed in the final SAR that will be used by the SDT

Comment Form — 2nd Draft of SAR for System Restoration and Blackstart

Please use this form to submit comments on the proposed SAR for System Restoration and Blackstart. Comments must be submitted by **March 9, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.com with the words "System Restoration SAR" in the subject line. If you have questions please contact Ed Dobrowolski at Ed.Dobrowolski@nerc.net or by telephone at 609-452-8060.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Mike Adibi	
Organization:	IRD Corporation	
Telephone:	3012998397	
E-mail:	madibird@aol.com	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs,
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input checked="" type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background Information:

This project involves upgrading the requirements in these four standards:

- EOP-005 — System Restoration Plans
- EOP-006 — Reliability Coordination – System Restoration
- EOP-007 — Establish, Maintain, and Document a Regional Blackstart Capability Plan
- EOP-009 — Documentation of Blackstart Generating Unit Test Results

The SAR drafting team posted the SAR for an initial comment period and stakeholders indicated agreement that there is a reliability-related need to upgrade the requirements in these four standards. Based on stakeholder comments, the SAR drafting team modified the SAR to improve clarity, and made the following significant changes:

- Updated the SAR form to reflect the terms used in the Functional Model V3 as directed by the Standards Committee and to reference the correct version of the standards
- Added more specificity to the 'Industry Need' and 'Brief Description' sections of the SAR
- Added language to clarify that the "To Do" list (renamed as an "Issues to be Addressed" list is a list of issues to consider in the refinement of the standards, not a list of modifications that must be made to the standards
- Modified the headings in "Standard Review Forms" to more clearly identify the source of the comments listed on those forms
- Added a copy of the "Standard Review Guidelines" to clarify the scope of modifications required to upgrade this set of standards and to identify the reference used by NERC staff in evaluating the quality of existing standards
- Added a new attachment to the SAR that includes additional issues that should be addressed during the refinement of the standards — these are issues raised by stakeholders during the first comment period for the System Restoration and Blackstart SAR.

The System Restoration and Blackout SAR Drafting Team would like to receive industry comments on Draft 2 of the SAR. Accordingly, we request that you include review the revised SAR, answer the questions on this form, and e-mail the form to sarcomm@nerc.com with the words "System Restoration SAR" in the subject line by **March 9, 2007**.

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

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

1. Do you agree with the revised scope of the proposed SAR?

Yes

No

Comments: Blackstart can be divided into Local Blackstart (LB) and Remote Blackstart (RB). In LB the blackstart unit(s) and the non-blackstart unit(s) are adjacent to each other (not necessarily in the same plant), with simple interconnecting links. In RB (which is more prevalent), the blackstart unit(s) are located remote from the non-blackstart unit(s), and the path in between includes several levels of overhead and/or underground transmission lines, distribution system and the required and necessary related loads.

Whereas LB can readily be studied, planned, simulated, scheduled, tested, timed and measured, the RB (or remote cranking) has a number of concerns and constraints requiring close coordination and agreements between a single blackstart owner (e.g., combustion turbine operator), transmission provider (for the path), distribution provider (for the necessary load), and a single (or at most two, see EdeF procedure), non-blackstart units (e.g., steam units). Experience has shown that in general remote blackstart are difficult and costly to schedule and test. The RB feasibility study requires analytical tools such as generator reactive capability program, optimal transformer tap setting program, optimal power flow program, that are needed and not readily available to optimize generator voltage set-points and the various transformer tap positions on no-load tap changers.

Testing RB is very difficult and expensive. To illustrate the difficulties, two RB cases that apparently were feasible are briefly described:

1. In one RB trial, it took the entire morning shift operators for bulk power, electrical system, CT and SES to isolate and clear the path, start the CT, and energize the path. The test had to be abandoned at the end of the shift without having completed the RB. One positive lesson learned was that during an actual power system restoration, the hot restart (blackstart) of the steam unit should not be attempted.

2. In a second RB case, analysis and simulation showed that in spite of using several programs on an iterative basis, to optimize the CTS and SES transformer taps and generator voltage set-points, CTS could not supply nor absorb the necessary reactive power for the start up of the large induction motors in the SES. It was concluded that additional shunt reactors need to be installed to reduce the lines charging currents and thus narrow the span between over- and under-excitations demands from the CTS.

It should be recognized that RB is one of the basic and early restoration requirements. Generally, combustion turbines, low-head short-conduit hydro or low-head pumped storage is used to remotely blackstart the drum-type steam units. The drum-type units are usually base-loaded, are located remote from the load centers to which they are connected by HV and EHV lines, supply large portion of demand, with maximum elapsed time for hot re-start of 30-45 minutes and minimum elapsed time for hot restart of 3 to 4 hours, and they need cranking power for start-up.

The combustion turbines are peaking units, supply daily peak loads, are located within the load centers, with cold start-up of within 5 to 10 minutes, and hot-restart of within 2 to 3 hours. They typically need no cranking power for start up, however the probability of successful cold start-up is about 30%, i.e., one in three combustion turbines. The required RB path typically includes HV and EHV transmission lines.

RB's REACTIVE POWER PROBLEMS:

In the course of a blackstart operation, two limiting conditions place severe demands on the reactive power capability of the blackstart source. One extreme operating condition occurs during the initial energization of the transmission path when the combustion turbine station (CTS) is called upon to absorb the charging currents of the cables, the high- and extra-high voltage connecting lines. The other extreme operating condition is when the combustion turbine generators supply the large amount of reactive power required during startup of the largest auxiliary motor in the steam electric station (SES). These under- and over-excitation demands may be met by optimum selections of the CTS step-up transformer and SES step-down auxiliary transformer tap positions, and by control of the generator voltage set points. The blackstart operation is complicated by the fact that the CTS generator step up and the SES auxiliary transformers are typically equipped with no-load (fixed) taps, and they are set for normal operation. Therefore, in the planning phase and prior to the blackstart tests or during restoration, the optimum tap positions for these transformers and the correct terminal voltage set point(s) for the generator need to be determined to satisfy the two conditions. It should also be noted that not all the no-load tap changers can remotely be repositioned.

Here are the three lists of the RB concerns and constraints:

A. Concerns with the Blackstart Units:

- * Start-up probability; one CT in two or one in three.
- * Governor speed-droop, automatic or manual (if manual, it must be adjusted to less than 2% for the first unit and returned to 5% for the second unit).
- * Frequency Response to Sudden Increase in Load (in route loads are required to stabilize the CTS)
- * Power reversal relays
- * Cross compensation of dual CTs (load Hogging)
- * Under-excitation limit when energizing the path, over-excitation limit when starting the large induction motors in SES.
- * GSU Xfmr differential relays
- * GSU and Aux Xfmr tap positions

B. Concerns with Non-Blackstart (steam) Units:

- * Start-up sequence of auxiliary induction motors (BFP, IDF, etc.)
- * Starting overcurrents of auxiliary motors (five times the running current)
- * Starting voltage dips of auxiliary motors (down to 80%)
- * Startup reactive power requirements of motors (max over-excitation)
- * Path's charging currents (max under-excitation)
- * Excessive negative sequence voltage and currents (not more than 4%)
- * Service transformer, tap position.

C. Concern the Interconnecting Path:

- * Frequency Transients when energizing EHV lines

- * Frequency Transients when starting motors
- * Minimum source operation of distance relays
- * Reclosing schemes when energizing lines
- * Synchro-check relays and standing phase angle.

Conclusions:

Implementation of each RB operation requires:

- * the use of related Generation, Transmission and Distribution facilities
- * planning (feasibility study), analyzes, simulation, field tests, training and exercise
- * each blackstart source has to be matched uniquely with a non-blackstart unit(s)
- * long-term contracts are required between the related G, T & D ownerships

It can also be concluded that many apparently available RBs, are not feasible. The NERC records show that they have caused considerable delays in the restoration procedure.

2. The SAR drafting team has checked off a large number of responsible entities as being applicable entities. We have done this in order to provide sufficient flexibility to the eventual standard drafting team and due to the fact that system restoration and blackstart can potentially touch so many different functional areas of operations.

Do you agree that the TOP should be responsible for securing blackstart services?

Yes

No

Comments: The three "Questions for 2nd Posting" - Volunteers

1. Do you agree with the revised scope of the proposed SAR?
2. The SAR DT has checked off a large number of responsible entities as being applicable entities. We have done this in order to provide sufficient flexibility to the eventual SDT and due to the fact that system restoration and black-start can potentially touch so many different functional areas of operations.
 - a. Do you agree that the TOP should be responsible for securing black-start services?
 - b. Do you agree that a Generator Owner and/or Generator Operator should have a documented plan for non-black-start units to be restarted after a blackout?
3. Do you agree that the SAR is ready to move forward to the standards drafting stage?

Response:

2-b. Agreed that a Generator Owner and/or Generator Operator should have a documented plan for starting their non-black-start units following a blackout. However, such a plan should be supported by simulation otherwise it will be meaningless.

3. The SAR in its present form is abstract. Both the non-black-start and black-start units need to be defined. The non-black-start units should cover types (e.g., no nuclear) and sizes (e.g., small and DG) of prime movers. And the black-start sources should include:

1. Combustion Turbine (local and remote)
2. Run-of-the-River Hydro (remote)
3. Pump-Storage Hydro (remote)

- 4. Low Frequency Isolation Scheme (LFIS)
- 5. Full Load Rejection (FLR)

It is a matter of records that in the aftermath of New York's 1977 blackout, FERC required that all utilities develop restoration plans. In the process of developing such a plan, one mid-Atlantic utility tried to provide black-start source for one of its large coal-fired plants. The choices were between (1) installing combustion turbines, (2) providing a low frequency isolation scheme, or (3) equipping the base-loaded unit with full-load rejection capability. The full-load rejection alternative was selected as providing the best balance between cost and reliability. Subsequently, following a major power disturbance, the FLR successfully tripped to house load. It can be concluded that the LFIS and FLR should also be considered as the black-start source.

It should be recognized that testing of remote black-start, LFIS or FLR is extremely difficult and expensive.

- 3. The SAR DT has checked off a large number of responsible entities as being applicable entities. We have done this in order to provide sufficient flexibility to the eventual SDT and due to the fact that system restoration and blackstart can potentially touch so many different functional areas of operations.

Do you agree that a Generator Owner and/or Generator Operator should have a documented plan for non-blackstart units to be restarted after a blackout?

- Yes
- No

Comments: With some reservations.

- 4. Do you agree that the SAR is ready to move forward to the standards drafting stage?

- Yes
- No

Comments: By and Large

Comment Form — 2nd Draft of SAR for System Restoration and Blackstart

Please use this form to submit comments on the proposed SAR for System Restoration and Blackstart. Comments must be submitted by **March 9, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.com with the words "System Restoration SAR" in the subject line. If you have questions please contact Ed Dobrowolski at Ed.Dobrowolski@nerc.net or by telephone at 609-452-8060.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Kathleen Goodman	
Organization:	ISO New England Inc.	
Telephone:	(413) 535-4111	
E-mail:	kgoodman@iso-ne.com	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs, ISOs,
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*

*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

Background Information:

This project involves upgrading the requirements in these four standards:

- EOP-005 — System Restoration Plans
- EOP-006 — Reliability Coordination – System Restoration
- EOP-007 — Establish, Maintain, and Document a Regional Blackstart Capability Plan
- EOP-009 — Documentation of Blackstart Generating Unit Test Results

The SAR drafting team posted the SAR for an initial comment period and stakeholders indicated agreement that there is a reliability-related need to upgrade the requirements in these four standards. Based on stakeholder comments, the SAR drafting team modified the SAR to improve clarity, and made the following significant changes:

- Updated the SAR form to reflect the terms used in the Functional Model V3 as directed by the Standards Committee and to reference the correct version of the standards
- Added more specificity to the 'Industry Need' and 'Brief Description' sections of the SAR
- Added language to clarify that the "To Do" list (renamed as an "Issues to be Addressed" list is a list of issues to consider in the refinement of the standards, not a list of modifications that must be made to the standards
- Modified the headings in "Standard Review Forms" to more clearly identify the source of the comments listed on those forms
- Added a copy of the "Standard Review Guidelines" to clarify the scope of modifications required to upgrade this set of standards and to identify the reference used by NERC staff in evaluating the quality of existing standards
- Added a new attachment to the SAR that includes additional issues that should be addressed during the refinement of the standards — these are issues raised by stakeholders during the first comment period for the System Restoration and Blackstart SAR.

The System Restoration and Blackout SAR Drafting Team would like to receive industry comments on Draft 2 of the SAR. Accordingly, we request that you include review the revised SAR, answer the questions on this form, and e-mail the form to sarcomm@nerc.com with the words "System Restoration SAR" in the subject line by **March 9, 2007**.

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

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

1. Do you agree with the revised scope of the proposed SAR?

Yes

No

Comments:

2. The SAR drafting team has checked off a large number of responsible entities as being applicable entities. We have done this in order to provide sufficient flexibility to the eventual standard drafting team and due to the fact that system restoration and blackstart can potentially touch so many different functional areas of operations.

Do you agree that the TOP should be responsible for securing blackstart services?

Yes

No

Comments:

3. The SAR DT has checked off a large number of responsible entities as being applicable entities. We have done this in order to provide sufficient flexibility to the eventual SDT and due to the fact that system restoration and blackstart can potentially touch so many different functional areas of operations.

Do you agree that a Generator Owner and/or Generator Operator should have a documented plan for non-blackstart units to be restarted after a blackout?

Yes

No

Comments: As a general matter, ISO-NE agrees that a Generator Owner and/or Generator Operator should have a documented plan for non-blackstart units to be restarted after a blackout. However, ISO-NE is concerned about the possibility that the Standard could end up requiring an RC, TOP, etc. to become directly involved with the Generator Owner and/or Generator Operator in the development of such a plan. The SAR should be clear that an RC, TOP, etc. shall not be designated as a responsible entity with respect to the development of such a plan and it will remain the requirement of the Owner/Operator.

4. Do you agree that the SAR is ready to move forward to the standards drafting stage?

Yes

No

Comments: ISO-NE agrees that the SAR is ready to move forward to the standards drafting stage if the concern expressed in our response to Question 3 above is addressed.

Comment Form — 2nd Draft of SAR for System Restoration and Blackstart

Please use this form to submit comments on the proposed SAR for System Restoration and Blackstart. Comments must be submitted by **March 9, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.com with the words "System Restoration SAR" in the subject line. If you have questions please contact Ed Dobrowolski at Ed.Dobrowolski@nerc.net or by telephone at 609-452-8060.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Michael Gammon	
Organization:	Kansas City Power & Light	
Telephone:	816-654-1242	
E-mail:	mike.gammon@kcpl.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs,
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input checked="" type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Comment Form — 2nd Draft of SAR for System Restoration and Blackstart

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment *

*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

Background Information:

This project involves upgrading the requirements in these four standards:

- EOP-005 — System Restoration Plans
- EOP-006 — Reliability Coordination – System Restoration
- EOP-007 — Establish, Maintain, and Document a Regional Blackstart Capability Plan
- EOP-009 — Documentation of Blackstart Generating Unit Test Results

The SAR drafting team posted the SAR for an initial comment period and stakeholders indicated agreement that there is a reliability-related need to upgrade the requirements in these four standards. Based on stakeholder comments, the SAR drafting team modified the SAR to improve clarity, and made the following significant changes:

- Updated the SAR form to reflect the terms used in the Functional Model V3 as directed by the Standards Committee and to reference the correct version of the standards
- Added more specificity to the 'Industry Need' and 'Brief Description' sections of the SAR
- Added language to clarify that the "To Do" list (renamed as an "Issues to be Addressed" list is a list of issues to consider in the refinement of the standards, not a list of modifications that must be made to the standards
- Modified the headings in "Standard Review Forms" to more clearly identify the source of the comments listed on those forms
- Added a copy of the "Standard Review Guidelines" to clarify the scope of modifications required to upgrade this set of standards and to identify the reference used by NERC staff in evaluating the quality of existing standards
- Added a new attachment to the SAR that includes additional issues that should be addressed during the refinement of the standards — these are issues raised by stakeholders during the first comment period for the System Restoration and Blackstart SAR.

The System Restoration and Blackout SAR Drafting Team would like to receive industry comments on Draft 2 of the SAR. Accordingly, we request that you include review the revised SAR, answer the questions on this form, and e-mail the form to sarcomm@nerc.com with the words "System Restoration SAR" in the subject line by **March 9, 2007**.

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

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

1. Do you agree with the revised scope of the proposed SAR?

Yes

No

Comments: During a system restoration (i.e. the August 2003 Blackout), the code of conduct was suspended so that orderly system restoration may occur. In other words, the market ceases to exist. Generator operators, transmission operators, market operators and load serving entities had to communicate and work together so that system restoration, using system load and generation may be restored. Therefore, on page SAR-6 under "Reliability and Market Interface Principles - Applicable Reliability Principles boxes 5, 6, and 7 should also be checked. Box 5 should be checked since communication is critical in a system restoration event. Box 6 should be checked because you need to have qualified people operating the system so that the personnel know what to do during a major system event. Box 7 should be checked since the system is unstable during the early hours of system restoration.

Standard Number EOP-005-0 is currently not applicable to the load serving entities. Load Serving Entities should be applicable since they are critical in system restoration. To restore a system, generation must come on, then load is restored, then more generation comes on, then more load is restored etc. Picking up load is crucial in system restoration.

2. The SAR drafting team has checked off a large number of responsible entities as being applicable entities. We have done this in order to provide sufficient flexibility to the eventual standard drafting team and due to the fact that system restoration and blackstart can potentially touch so many different functional areas of operations.

Do you agree that the TOP should be responsible for securing blackstart services?

Yes

No

Comments:

3. The SAR DT has checked off a large number of responsible entities as being applicable entities. We have done this in order to provide sufficient flexibility to the eventual SDT and due to the fact that system restoration and blackstart can potentially touch so many different functional areas of operations.

Do you agree that a Generator Owner and/or Generator Operator should have a documented plan for non-blackstart units to be restarted after a blackout?

Yes

No

Comments:

4. Do you agree that the SAR is ready to move forward to the standards drafting stage?

Yes

No

Comments:

Comment Form — 2nd Draft of SAR for System Restoration and Blackstart

Please use this form to submit comments on the proposed SAR for System Restoration and Blackstart. Comments must be submitted by **March 9, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.com with the words "System Restoration SAR" in the subject line. If you have questions please contact Ed Dobrowolski at Ed.Dobrowolski@nerc.net or by telephone at 609-452-8060.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Robert Coish	
Organization:	Manitoba Hydro	
Telephone:	204-487-4579	
E-mail:	rgcoish@hydro.mb.ca	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs,
<input checked="" type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input checked="" type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input checked="" type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background Information:

This project involves upgrading the requirements in these four standards:

- EOP-005 — System Restoration Plans
- EOP-006 — Reliability Coordination – System Restoration
- EOP-007 — Establish, Maintain, and Document a Regional Blackstart Capability Plan
- EOP-009 — Documentation of Blackstart Generating Unit Test Results

The SAR drafting team posted the SAR for an initial comment period and stakeholders indicated agreement that there is a reliability-related need to upgrade the requirements in these four standards. Based on stakeholder comments, the SAR drafting team modified the SAR to improve clarity, and made the following significant changes:

- Updated the SAR form to reflect the terms used in the Functional Model V3 as directed by the Standards Committee and to reference the correct version of the standards
- Added more specificity to the 'Industry Need' and 'Brief Description' sections of the SAR
- Added language to clarify that the "To Do" list (renamed as an "Issues to be Addressed" list is a list of issues to consider in the refinement of the standards, not a list of modifications that must be made to the standards
- Modified the headings in "Standard Review Forms" to more clearly identify the source of the comments listed on those forms
- Added a copy of the "Standard Review Guidelines" to clarify the scope of modifications required to upgrade this set of standards and to identify the reference used by NERC staff in evaluating the quality of existing standards
- Added a new attachment to the SAR that includes additional issues that should be addressed during the refinement of the standards — these are issues raised by stakeholders during the first comment period for the System Restoration and Blackstart SAR.

The System Restoration and Blackout SAR Drafting Team would like to receive industry comments on Draft 2 of the SAR. Accordingly, we request that you include review the revised SAR, answer the questions on this form, and e-mail the form to sarcomm@nerc.com with the words "System Restoration SAR" in the subject line by **March 9, 2007**.

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

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

1. Do you agree with the revised scope of the proposed SAR?

Yes

No

Comments: A lot of good work has been put in to drafting this SAR to identify all the significant issues from the various sources for the SDT to address. This approach is an improvement over previous SARs. However, it doesn't seem clear how the SDT is to address the "fill-in-the-blanks" elements in the existing standards.

2. The SAR drafting team has checked off a large number of responsible entities as being applicable entities. We have done this in order to provide sufficient flexibility to the eventual standard drafting team and due to the fact that system restoration and blackstart can potentially touch so many different functional areas of operations.

Do you agree that the TOP should be responsible for securing blackstart services?

Yes

No

Comments:

3. The SAR DT has checked off a large number of responsible entities as being applicable entities. We have done this in order to provide sufficient flexibility to the eventual SDT and due to the fact that system restoration and blackstart can potentially touch so many different functional areas of operations.

Do you agree that a Generator Owner and/or Generator Operator should have a documented plan for non-blackstart units to be restarted after a blackout?

Yes

No

Comments: It was not clear where this was being proposed in the SAR. A good system restoration plan should outline options for how non-blackstart units will be started after a blackout. These aspects of the plan should be shared with the GO/GOP and coordinated with the GO/GOP plans.

4. Do you agree that the SAR is ready to move forward to the standards drafting stage?

Yes

No

Comments:

Comment Form — 2nd Draft of SAR for System Restoration and Blackstart

Please use this form to submit comments on the proposed SAR for System Restoration and Blackstart. Comments must be submitted by **March 9, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.com with the words "System Restoration SAR" in the subject line. If you have questions please contact Ed Dobrowolski at Ed.Dobrowolski@nerc.net or by telephone at 609-452-8060.

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

Comment Form — 2nd Draft of SAR for System Restoration and Blackstart

Group Comments (Complete this page if comments are from a group.)

Group Name: Midwest ISO and individual stakeholders
Lead Contact: Jason Marshall
Contact Organization: Midwest ISO
Contact Segment: 2
Contact Telephone: (317) 249-5494
Contact E-mail: jmarshall@midwestiso.org

Additional Member Name	Additional Member Organization	Region*	Segment*
Brian F. Thumm	ITC	RFC	1
Jim Cyrulewski	JDRJC Associates	RFC	8

*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

Background Information:

This project involves upgrading the requirements in these four standards:

- EOP-005 — System Restoration Plans
- EOP-006 — Reliability Coordination – System Restoration
- EOP-007 — Establish, Maintain, and Document a Regional Blackstart Capability Plan
- EOP-009 — Documentation of Blackstart Generating Unit Test Results

The SAR drafting team posted the SAR for an initial comment period and stakeholders indicated agreement that there is a reliability-related need to upgrade the requirements in these four standards. Based on stakeholder comments, the SAR drafting team modified the SAR to improve clarity, and made the following significant changes:

- Updated the SAR form to reflect the terms used in the Functional Model V3 as directed by the Standards Committee and to reference the correct version of the standards
- Added more specificity to the 'Industry Need' and 'Brief Description' sections of the SAR
- Added language to clarify that the "To Do" list (renamed as an "Issues to be Addressed" list is a list of issues to consider in the refinement of the standards, not a list of modifications that must be made to the standards
- Modified the headings in "Standard Review Forms" to more clearly identify the source of the comments listed on those forms
- Added a copy of the "Standard Review Guidelines" to clarify the scope of modifications required to upgrade this set of standards and to identify the reference used by NERC staff in evaluating the quality of existing standards
- Added a new attachment to the SAR that includes additional issues that should be addressed during the refinement of the standards — these are issues raised by stakeholders during the first comment period for the System Restoration and Blackstart SAR.

The System Restoration and Blackout SAR Drafting Team would like to receive industry comments on Draft 2 of the SAR. Accordingly, we request that you include review the revised SAR, answer the questions on this form, and e-mail the form to sarcomm@nerc.com with the words "System Restoration SAR" in the subject line by **March 9, 2007**.

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

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

1. Do you agree with the revised scope of the proposed SAR?

Yes

No

Comments: While we agree with the need for some improvement in the existing standards, there are misstatements in the SAR. The RC has defined responsibilities in the present standards. The SAR implies this isn't the case. Also, a SAR should be setting a clear scope of the end product, such that a different knowledgeable people would draft similar standards. It's unclear where this will go.

2. The SAR drafting team has checked off a large number of responsible entities as being applicable entities. We have done this in order to provide sufficient flexibility to the eventual standard drafting team and due to the fact that system restoration and blackstart can potentially touch so many different functional areas of operations.

Do you agree that the TOP should be responsible for securing blackstart services?

Yes

No

Comments: We're not sure what this means. While the TOP must have a plan that will work, the question implies there must be contractual obligations that back up all plans, and perhaps all scenarios. While it's good to have cranking paths and a plan laid out, we're concerned that this standard will preclude flexibility when the real need arises.

3. The SAR DT has checked off a large number of responsible entities as being applicable entities. We have done this in order to provide sufficient flexibility to the eventual SDT and due to the fact that system restoration and blackstart can potentially touch so many different functional areas of operations.

Do you agree that a Generator Owner and/or Generator Operator should have a documented plan for non-blackstart units to be restarted after a blackout?

Yes

No

Comments: We agree that all generator operators should have an understanding of their role and possible scenarios they will face. The generator operators should also test or train on their plan/role periodically.

4. Do you agree that the SAR is ready to move forward to the standards drafting stage?

Yes

No

Comments: Again, we agree for some improvement, but we have difficulty in understanding where this is going.

Comment Form — 2nd Draft of SAR for System Restoration and Blackstart

Please use this form to submit comments on the proposed SAR for System Restoration and Blackstart. Comments must be submitted by **March 9, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.com with the words "System Restoration SAR" in the subject line. If you have questions please contact Ed Dobrowolski at Ed.Dobrowolski@nerc.net or by telephone at 609-452-8060.

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

Comment Form — 2nd Draft of SAR for System Restoration and Blackstart

Group Comments (Complete this page if comments are from a group.)

Group Name: NPCC CP9, Reliability Standards Working Group
Lead Contact: Guy V. Zito
Contact Organization: Northeast Power Coordinating Council
Contact Segment: 10
Contact Telephone: 212-840-1070
Contact E-mail: gzito@npcc.org

Additional Member Name	Additional Member Organization	Region*	Segment*
Ralph Rufrano	New York Power Authority	NPCC	1
Ed Thompson	ConEd	NPCC	1
Herb Schrayshuen	National Grid US	NPCC	1
Kathleen Goodman	ISO-New England	NPCC	2
Bill Shemley	ISO-New England	NPCC	2
Greg Campoli	New York ISO	NPCC	2
Roger Champagne	TransEnergie HydroQuebec	NPCC	1
Bruno Jesus	Hydro One Networks	NPCC	1
Jerad Barnhart	NStar	NPCC	1
Murale Gopinathan	Northeast Utilities	NPCC	1
Al Adamson	New York State Reliability Council`	NPCC	10
Don Nelson	MA Dept. Of Tel. and Energy	NPCC	9
Randy Macdonald	New Brunswick System Operator	NPCC	2

Comment Form — 2nd Draft of SAR for System Restoration and Blackstart

*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

Background Information:

This project involves upgrading the requirements in these four standards:

- EOP-005 — System Restoration Plans
- EOP-006 — Reliability Coordination – System Restoration
- EOP-007 — Establish, Maintain, and Document a Regional Blackstart Capability Plan
- EOP-009 — Documentation of Blackstart Generating Unit Test Results

The SAR drafting team posted the SAR for an initial comment period and stakeholders indicated agreement that there is a reliability-related need to upgrade the requirements in these four standards. Based on stakeholder comments, the SAR drafting team modified the SAR to improve clarity, and made the following significant changes:

- Updated the SAR form to reflect the terms used in the Functional Model V3 as directed by the Standards Committee and to reference the correct version of the standards
- Added more specificity to the 'Industry Need' and 'Brief Description' sections of the SAR
- Added language to clarify that the "To Do" list (renamed as an "Issues to be Addressed" list is a list of issues to consider in the refinement of the standards, not a list of modifications that must be made to the standards
- Modified the headings in "Standard Review Forms" to more clearly identify the source of the comments listed on those forms
- Added a copy of the "Standard Review Guidelines" to clarify the scope of modifications required to upgrade this set of standards and to identify the reference used by NERC staff in evaluating the quality of existing standards
- Added a new attachment to the SAR that includes additional issues that should be addressed during the refinement of the standards — these are issues raised by stakeholders during the first comment period for the System Restoration and Blackstart SAR.

The System Restoration and Blackout SAR Drafting Team would like to receive industry comments on Draft 2 of the SAR. Accordingly, we request that you include review the revised SAR, answer the questions on this form, and e-mail the form to sarcomm@nerc.com with the words "System Restoration SAR" in the subject line by **March 9, 2007**.

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

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

1. Do you agree with the revised scope of the proposed SAR?

Yes

No

Comments:

2. The SAR drafting team has checked off a large number of responsible entities as being applicable entities. We have done this in order to provide sufficient flexibility to the eventual standard drafting team and due to the fact that system restoration and blackstart can potentially touch so many different functional areas of operations.

Do you agree that the TOP should be responsible for securing blackstart services?

Yes

No

Comments:

3. The SAR DT has checked off a large number of responsible entities as being applicable entities. We have done this in order to provide sufficient flexibility to the eventual SDT and due to the fact that system restoration and blackstart can potentially touch so many different functional areas of operations.

Do you agree that a Generator Owner and/or Generator Operator should have a documented plan for non-blackstart units to be restarted after a blackout?

Yes

No

Comments: NPCC participating members agree that a Generator Owner and/or Generator Operator should have a plan to be ready to re-start non-blackstart units after a blackout.

However, a NERC standard requirement(s) to have a documented plan for generating units to be restarted after a blackout should be limited to the 'restoration plan participants" on the cranking path only. The cranking path to be developed in the restoration plan would include those units that must be started or resynchronized to support the integrity of the path.

4. Do you agree that the SAR is ready to move forward to the standards drafting stage?

Yes

No

Comments:

Comment Form — 2nd Draft of SAR for System Restoration and Blackstart

Please use this form to submit comments on the proposed SAR for System Restoration and Blackstart. Comments must be submitted by **March 9, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.com with the words "System Restoration SAR" in the subject line. If you have questions please contact Ed Dobrowolski at Ed.Dobrowolski@nerc.net or by telephone at 609-452-8060.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Michael Calimano	
Organization:	New York Independent System Operator	
Telephone:	518-356-6129	
E-mail:	mcalimano@nyiso.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs, ISOs,
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background Information:

This project involves upgrading the requirements in these four standards:

- EOP-005 — System Restoration Plans
- EOP-006 — Reliability Coordination – System Restoration
- EOP-007 — Establish, Maintain, and Document a Regional Blackstart Capability Plan
- EOP-009 — Documentation of Blackstart Generating Unit Test Results

The SAR drafting team posted the SAR for an initial comment period and stakeholders indicated agreement that there is a reliability-related need to upgrade the requirements in these four standards. Based on stakeholder comments, the SAR drafting team modified the SAR to improve clarity, and made the following significant changes:

- Updated the SAR form to reflect the terms used in the Functional Model V3 as directed by the Standards Committee and to reference the correct version of the standards
- Added more specificity to the 'Industry Need' and 'Brief Description' sections of the SAR
- Added language to clarify that the "To Do" list (renamed as an "Issues to be Addressed" list is a list of issues to consider in the refinement of the standards, not a list of modifications that must be made to the standards
- Modified the headings in "Standard Review Forms" to more clearly identify the source of the comments listed on those forms
- Added a copy of the "Standard Review Guidelines" to clarify the scope of modifications required to upgrade this set of standards and to identify the reference used by NERC staff in evaluating the quality of existing standards
- Added a new attachment to the SAR that includes additional issues that should be addressed during the refinement of the standards — these are issues raised by stakeholders during the first comment period for the System Restoration and Blackstart SAR.

The System Restoration and Blackout SAR Drafting Team would like to receive industry comments on Draft 2 of the SAR. Accordingly, we request that you include review the revised SAR, answer the questions on this form, and e-mail the form to sarcomm@nerc.com with the words "System Restoration SAR" in the subject line by **March 9, 2007**.

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

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

1. Do you agree with the revised scope of the proposed SAR?

Yes

No

Comments:

2. The SAR drafting team has checked off a large number of responsible entities as being applicable entities. We have done this in order to provide sufficient flexibility to the eventual standard drafting team and due to the fact that system restoration and blackstart can potentially touch so many different functional areas of operations.

Do you agree that the TOP should be responsible for securing blackstart services?

Yes

No

Comments:

3. The SAR DT has checked off a large number of responsible entities as being applicable entities. We have done this in order to provide sufficient flexibility to the eventual SDT and due to the fact that system restoration and blackstart can potentially touch so many different functional areas of operations.

Do you agree that a Generator Owner and/or Generator Operator should have a documented plan for non-blackstart units to be restarted after a blackout?

Yes

No

Comments: Each generator owner and/or generator operator should typically have a plan to be ready to re-start after a trip or blackout, when the power system is reenergized and conditions warrant. This readiness for energization should also apply to all distributors and loads connected to the bulk electrical system (BES) as well.

However, a NERC standard requirement(s) to have a documented plan for generating units to be restarted after a blackout should be limited to the 'restoration plan participants' on the cranking path only. The cranking path to be developed in the restoration plan would include those units that must be started or resynchronized to support the integrity of the path.

4. Do you agree that the SAR is ready to move forward to the standards drafting stage?

Yes

No

Comments:

Comment Form — 2nd Draft of SAR for System Restoration and Blackstart

Please use this form to submit comments on the proposed SAR for System Restoration and Blackstart. Comments must be submitted by **March 9, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.com with the words "System Restoration SAR" in the subject line. If you have questions please contact Ed Dobrowolski at Ed.Dobrowolski@nerc.net or by telephone at 609-452-8060.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Brett Koelsch	
Organization:	PEC	
Telephone:	919 546 3046	
E-mail:	brett.koelsch@pgnmail.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs,
<input type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input checked="" type="checkbox"/>	5 — Electric Generators
<input checked="" type="checkbox"/> SERC	<input checked="" type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background Information:

This project involves upgrading the requirements in these four standards:

- EOP-005 — System Restoration Plans
- EOP-006 — Reliability Coordination – System Restoration
- EOP-007 — Establish, Maintain, and Document a Regional Blackstart Capability Plan
- EOP-009 — Documentation of Blackstart Generating Unit Test Results

The SAR drafting team posted the SAR for an initial comment period and stakeholders indicated agreement that there is a reliability-related need to upgrade the requirements in these four standards. Based on stakeholder comments, the SAR drafting team modified the SAR to improve clarity, and made the following significant changes:

- Updated the SAR form to reflect the terms used in the Functional Model V3 as directed by the Standards Committee and to reference the correct version of the standards
- Added more specificity to the 'Industry Need' and 'Brief Description' sections of the SAR
- Added language to clarify that the "To Do" list (renamed as an "Issues to be Addressed" list is a list of issues to consider in the refinement of the standards, not a list of modifications that must be made to the standards
- Modified the headings in "Standard Review Forms" to more clearly identify the source of the comments listed on those forms
- Added a copy of the "Standard Review Guidelines" to clarify the scope of modifications required to upgrade this set of standards and to identify the reference used by NERC staff in evaluating the quality of existing standards
- Added a new attachment to the SAR that includes additional issues that should be addressed during the refinement of the standards — these are issues raised by stakeholders during the first comment period for the System Restoration and Blackstart SAR.

The System Restoration and Blackout SAR Drafting Team would like to receive industry comments on Draft 2 of the SAR. Accordingly, we request that you include review the revised SAR, answer the questions on this form, and e-mail the form to sarcomm@nerc.com with the words "System Restoration SAR" in the subject line by **March 9, 2007**.

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

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

1. Do you agree with the revised scope of the proposed SAR?

Yes

No

Comments:

2. The SAR drafting team has checked off a large number of responsible entities as being applicable entities. We have done this in order to provide sufficient flexibility to the eventual standard drafting team and due to the fact that system restoration and blackstart can potentially touch so many different functional areas of operations.

Do you agree that the TOP should be responsible for securing blackstart services?

Yes

No

Comments:

3. The SAR DT has checked off a large number of responsible entities as being applicable entities. We have done this in order to provide sufficient flexibility to the eventual SDT and due to the fact that system restoration and blackstart can potentially touch so many different functional areas of operations.

Do you agree that a Generator Owner and/or Generator Operator should have a documented plan for non-blackstart units to be restarted after a blackout?

Yes

No

Comments:

4. Do you agree that the SAR is ready to move forward to the standards drafting stage?

Yes

No

Comments:

Comment Form — 2nd Draft of SAR for System Restoration and Blackstart

Please use this form to submit comments on the proposed SAR for System Restoration and Blackstart. Comments must be submitted by **March 9, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.com with the words "System Restoration SAR" in the subject line. If you have questions please contact Ed Dobrowolski at Ed.Dobrowolski@nerc.net or by telephone at 609-452-8060.

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

Comment Form — 2nd Draft of SAR for System Restoration and Blackstart

Group Comments (Complete this page if comments are from a group.)

Group Name: Southern Company
Lead Contact: J. T. Wood
Contact Organization: Southern Company Services
Contact Segment:
Contact Telephone: 205-257-6236
Contact E-mail: jtwood@southernco.com

Additional Member Name	Additional Member Organization	Region*	Segment*
Tom Higgins	Southern Company Services		5
Jim Busbin	Southern Company Services		1
Marc Butts	Southern Company Services		1

*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

Background Information:

This project involves upgrading the requirements in these four standards:

- EOP-005 — System Restoration Plans
- EOP-006 — Reliability Coordination – System Restoration
- EOP-007 — Establish, Maintain, and Document a Regional Blackstart Capability Plan
- EOP-009 — Documentation of Blackstart Generating Unit Test Results

The SAR drafting team posted the SAR for an initial comment period and stakeholders indicated agreement that there is a reliability-related need to upgrade the requirements in these four standards. Based on stakeholder comments, the SAR drafting team modified the SAR to improve clarity, and made the following significant changes:

- Updated the SAR form to reflect the terms used in the Functional Model V3 as directed by the Standards Committee and to reference the correct version of the standards
- Added more specificity to the 'Industry Need' and 'Brief Description' sections of the SAR
- Added language to clarify that the "To Do" list (renamed as an "Issues to be Addressed" list is a list of issues to consider in the refinement of the standards, not a list of modifications that must be made to the standards
- Modified the headings in "Standard Review Forms" to more clearly identify the source of the comments listed on those forms
- Added a copy of the "Standard Review Guidelines" to clarify the scope of modifications required to upgrade this set of standards and to identify the reference used by NERC staff in evaluating the quality of existing standards
- Added a new attachment to the SAR that includes additional issues that should be addressed during the refinement of the standards — these are issues raised by stakeholders during the first comment period for the System Restoration and Blackstart SAR.

The System Restoration and Blackout SAR Drafting Team would like to receive industry comments on Draft 2 of the SAR. Accordingly, we request that you include review the revised SAR, answer the questions on this form, and e-mail the form to sarcomm@nerc.com with the words "System Restoration SAR" in the subject line by **March 9, 2007**.

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

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

1. Do you agree with the revised scope of the proposed SAR?

Yes

No

Comments:

2. The SAR drafting team has checked off a large number of responsible entities as being applicable entities. We have done this in order to provide sufficient flexibility to the eventual standard drafting team and due to the fact that system restoration and blackstart can potentially touch so many different functional areas of operations.

Do you agree that the TOP should be responsible for securing blackstart services?

Yes

No

Comments:

3. The SAR DT has checked off a large number of responsible entities as being applicable entities. We have done this in order to provide sufficient flexibility to the eventual SDT and due to the fact that system restoration and blackstart can potentially touch so many different functional areas of operations.

Do you agree that a Generator Owner and/or Generator Operator should have a documented plan for non-blackstart units to be restarted after a blackout?

Yes

No

Comments: Black start of non-blackstart units should basically be the same as a normal start-up.

4. Do you agree that the SAR is ready to move forward to the standards drafting stage?

Yes

No

Comments:

Comment Form — 2nd Draft of SAR for System Restoration and Blackstart

Please use this form to submit comments on the proposed SAR for System Restoration and Blackstart. Comments must be submitted by **March 9, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.com with the words "System Restoration SAR" in the subject line. If you have questions please contact Ed Dobrowolski at Ed.Dobrowolski@nerc.net or by telephone at 609-452-8060.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Mike Pfeister	
Organization:	Salt River Project	
Telephone:	602-236-3970	
E-mail:	Mike.Pfeister@srpnet.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs,
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input checked="" type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Group Comments (Complete this page if comments are from a group.)
Group Name:
Lead Contact:
Contact Organization:
Contact Segment:
Contact Telephone:
Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*

*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

Background Information:

This project involves upgrading the requirements in these four standards:

- EOP-005 — System Restoration Plans
- EOP-006 — Reliability Coordination – System Restoration
- EOP-007 — Establish, Maintain, and Document a Regional Blackstart Capability Plan
- EOP-009 — Documentation of Blackstart Generating Unit Test Results

The SAR drafting team posted the SAR for an initial comment period and stakeholders indicated agreement that there is a reliability-related need to upgrade the requirements in these four standards. Based on stakeholder comments, the SAR drafting team modified the SAR to improve clarity, and made the following significant changes:

- Updated the SAR form to reflect the terms used in the Functional Model V3 as directed by the Standards Committee and to reference the correct version of the standards
- Added more specificity to the 'Industry Need' and 'Brief Description' sections of the SAR
- Added language to clarify that the "To Do" list (renamed as an "Issues to be Addressed" list is a list of issues to consider in the refinement of the standards, not a list of modifications that must be made to the standards
- Modified the headings in "Standard Review Forms" to more clearly identify the source of the comments listed on those forms
- Added a copy of the "Standard Review Guidelines" to clarify the scope of modifications required to upgrade this set of standards and to identify the reference used by NERC staff in evaluating the quality of existing standards
- Added a new attachment to the SAR that includes additional issues that should be addressed during the refinement of the standards — these are issues raised by stakeholders during the first comment period for the System Restoration and Blackstart SAR.

The System Restoration and Blackout SAR Drafting Team would like to receive industry comments on Draft 2 of the SAR. Accordingly, we request that you include review the revised SAR, answer the questions on this form, and e-mail the form to sarcomm@nerc.com with the words "System Restoration SAR" in the subject line by **March 9, 2007**.

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

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

1. Do you agree with the revised scope of the proposed SAR?

Yes

No

Comments:

2. The SAR drafting team has checked off a large number of responsible entities as being applicable entities. We have done this in order to provide sufficient flexibility to the eventual standard drafting team and due to the fact that system restoration and blackstart can potentially touch so many different functional areas of operations.

Do you agree that the TOP should be responsible for securing blackstart services?

Yes

No

Comments:

3. The SAR DT has checked off a large number of responsible entities as being applicable entities. We have done this in order to provide sufficient flexibility to the eventual SDT and due to the fact that system restoration and blackstart can potentially touch so many different functional areas of operations.

Do you agree that a Generator Owner and/or Generator Operator should have a documented plan for non-blackstart units to be restarted after a blackout?

Yes

No

Comments:

4. Do you agree that the SAR is ready to move forward to the standards drafting stage?

Yes

No

Comments:

Comment Form — 2nd Draft of SAR for System Restoration and Blackstart

Please use this form to submit comments on the proposed SAR for System Restoration and Blackstart. Comments must be submitted by **March 9, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.com with the words "System Restoration SAR" in the subject line. If you have questions please contact Ed Dobrowolski at Ed.Dobrowolski@nerc.net or by telephone at 609-452-8060.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Jim Sorrels	
Organization:	American Electric Power	
Telephone:	614-716-2370	
E-mail:	jhsorrels@aep.com	
NERC Region		Registered Ballot Body Segment
<input checked="" type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs,
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input checked="" type="checkbox"/> RFC	<input checked="" type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input checked="" type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input checked="" type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background Information:

This project involves upgrading the requirements in these four standards:

- EOP-005 — System Restoration Plans
- EOP-006 — Reliability Coordination – System Restoration
- EOP-007 — Establish, Maintain, and Document a Regional Blackstart Capability Plan
- EOP-009 — Documentation of Blackstart Generating Unit Test Results

The SAR drafting team posted the SAR for an initial comment period and stakeholders indicated agreement that there is a reliability-related need to upgrade the requirements in these four standards. Based on stakeholder comments, the SAR drafting team modified the SAR to improve clarity, and made the following significant changes:

- Updated the SAR form to reflect the terms used in the Functional Model V3 as directed by the Standards Committee and to reference the correct version of the standards
- Added more specificity to the 'Industry Need' and 'Brief Description' sections of the SAR
- Added language to clarify that the "To Do" list (renamed as an "Issues to be Addressed" list is a list of issues to consider in the refinement of the standards, not a list of modifications that must be made to the standards
- Modified the headings in "Standard Review Forms" to more clearly identify the source of the comments listed on those forms
- Added a copy of the "Standard Review Guidelines" to clarify the scope of modifications required to upgrade this set of standards and to identify the reference used by NERC staff in evaluating the quality of existing standards
- Added a new attachment to the SAR that includes additional issues that should be addressed during the refinement of the standards — these are issues raised by stakeholders during the first comment period for the System Restoration and Blackstart SAR.

The System Restoration and Blackout SAR Drafting Team would like to receive industry comments on Draft 2 of the SAR. Accordingly, we request that you include review the revised SAR, answer the questions on this form, and e-mail the form to sarcomm@nerc.com with the words "System Restoration SAR" in the subject line by **March 9, 2007**.

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

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

1. Do you agree with the revised scope of the proposed SAR?

Yes

No

Comments: Concerning Phase III/IV comments, bullets 2 & 3 require the designation of a cranking path as part of a blackstart agreement between the transmission operator and generator owner. As it is unknown a priori how the electric system may break apart during a system collapse, the designation of a cranking path as part of a blackstart agreement unduly restricts the options available during restoration and may even make restoration impossible due to a contractually imposed constraint(s).

No 'market' based or artificially imposed constraints should be placed on the system during restoration. System restoration operations, other than providing blackstart resources, should be not be 'market' based.

2. The SAR drafting team has checked off a large number of responsible entities as being applicable entities. We have done this in order to provide sufficient flexibility to the eventual standard drafting team and due to the fact that system restoration and blackstart can potentially touch so many different functional areas of operations.

Do you agree that the TOP should be responsible for securing blackstart services?

Yes

No

Comments:

3. The SAR DT has checked off a large number of responsible entities as being applicable entities. We have done this in order to provide sufficient flexibility to the eventual SDT and due to the fact that system restoration and blackstart can potentially touch so many different functional areas of operations.

Do you agree that a Generator Owner and/or Generator Operator should have a documented plan for non-blackstart units to be restarted after a blackout?

Yes

No

Comments: This is not needed. The system restoration plan provides the necessary steps to provide cranking power to non-blackstart units. Once these units have had cranking power restored, the start up procedures are the same as if these units were returning from a scheduled/unscheduled outage during normal system operation. Is there really any need to have this documented?

4. Do you agree that the SAR is ready to move forward to the standards drafting stage?

Comment Form — 2nd Draft of SAR for System Restoration and Blackstart

Yes

No

Comments: See items 1 & 3 above.

Comment Form — 2nd Draft of SAR for System Restoration and Blackstart

Please use this form to submit comments on the proposed SAR for System Restoration and Blackstart. Comments must be submitted by **March 9, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.com with the words "System Restoration SAR" in the subject line. If you have questions please contact Ed Dobrowolski at Ed.Dobrowolski@nerc.net or by telephone at 609-452-8060.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Brian Thumm	
Organization:	ITC Holdings	
Telephone:	248.374.7846	
E-mail:	bthumm@itctransco.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs,
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input checked="" type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background Information:

This project involves upgrading the requirements in these four standards:

- EOP-005 — System Restoration Plans
- EOP-006 — Reliability Coordination – System Restoration
- EOP-007 — Establish, Maintain, and Document a Regional Blackstart Capability Plan
- EOP-009 — Documentation of Blackstart Generating Unit Test Results

The SAR drafting team posted the SAR for an initial comment period and stakeholders indicated agreement that there is a reliability-related need to upgrade the requirements in these four standards. Based on stakeholder comments, the SAR drafting team modified the SAR to improve clarity, and made the following significant changes:

- Updated the SAR form to reflect the terms used in the Functional Model V3 as directed by the Standards Committee and to reference the correct version of the standards
- Added more specificity to the 'Industry Need' and 'Brief Description' sections of the SAR
- Added language to clarify that the "To Do" list (renamed as an "Issues to be Addressed" list is a list of issues to consider in the refinement of the standards, not a list of modifications that must be made to the standards
- Modified the headings in "Standard Review Forms" to more clearly identify the source of the comments listed on those forms
- Added a copy of the "Standard Review Guidelines" to clarify the scope of modifications required to upgrade this set of standards and to identify the reference used by NERC staff in evaluating the quality of existing standards
- Added a new attachment to the SAR that includes additional issues that should be addressed during the refinement of the standards — these are issues raised by stakeholders during the first comment period for the System Restoration and Blackstart SAR.

The System Restoration and Blackout SAR Drafting Team would like to receive industry comments on Draft 2 of the SAR. Accordingly, we request that you include review the revised SAR, answer the questions on this form, and e-mail the form to sarcomm@nerc.com with the words "System Restoration SAR" in the subject line by **March 9, 2007**.

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

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

1. Do you agree with the revised scope of the proposed SAR?

Yes

No

Comments:

2. The SAR drafting team has checked off a large number of responsible entities as being applicable entities. We have done this in order to provide sufficient flexibility to the eventual standard drafting team and due to the fact that system restoration and blackstart can potentially touch so many different functional areas of operations.

Do you agree that the TOP should be responsible for securing blackstart services?

Yes

No

Comments: We are not sure what "securing" means. We also feel that generator owners/operators should be compelled by the Standards to provide blackstart services, and that the cost recovery for providing such services should not fall back on the Transmission Operator.

3. The SAR DT has checked off a large number of responsible entities as being applicable entities. We have done this in order to provide sufficient flexibility to the eventual SDT and due to the fact that system restoration and blackstart can potentially touch so many different functional areas of operations.

Do you agree that a Generator Owner and/or Generator Operator should have a documented plan for non-blackstart units to be restarted after a blackout?

Yes

No

Comments: In addition, the Generator Operator should demonstrate, through testing or simulation, that the non-blackstart unit can in fact be restarted using the blackout generator.

4. Do you agree that the SAR is ready to move forward to the standards drafting stage?

Yes

No

Comments: