

## Consideration of Comments on 1<sup>st</sup> Draft of System Restoration and Blackstart SAR

The System Restoration and Blackstart SAR Drafting Team thanks all commenters who submitted comments on Draft 1 of the System Restoration and Blackstart SAR. This SAR was posted for a 30-day public comment period from November 6 through December 5, 2006. The System Restoration and Blackstart SAR Drafting Team asked stakeholders to provide feedback on the standard through a special standard Comment Form. There were 26 sets of comments, including comments from more than 65 different people from more than 40 companies representing 8 of the 10 Industry Segments as shown in the table on the following pages.

Based on the comments received, the drafting team is recommending that the SAR be re-posted for an additional comment period. The drafting team made the following significant revisions to the SAR:

- Updated the SAR form to reflect the terms used in the Functional Model V3 as directed by the Standards Committee
- 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.

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

[http://www.nerc.com/~filez/standards/System\\_Restoration\\_Blackstart.html](http://www.nerc.com/~filez/standards/System_Restoration_Blackstart.html)

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

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

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

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	Commenter	Organization	Industry Segment											
			1	2	3	4	5	6	7	8	9	10		
34.	Herbert Schrayshuen (NGrid)	NPCC CP9 Reliability Standards Working Group	✓											
35.	Donald Nelson (MA Dept. of Tele and Energy)	NPCC CP9 Reliability Standards Working Group											✓	
36.	Ed Thompson (ConEd)	NPCC CP9 Reliability Standards Working Group	✓											
37.	Ron Falsetti (IESO)	NPCC CP9 Reliability Standards Working Group		✓										
38.	Alan Adamson (NYSRC)	NPCC CP9 Reliability Standards Working Group												✓
39.	Jerad Barnhart	NSTAR Electric	✓											
40.	Mike Anthony	Progress Energy Carolinas	✓											
41.	Phil Riley	Public Service Commission of SC											✓	
42.	Mignon L. Clyburn	Public Service Commission of SC											✓	
43.	Elizabeth B. Fleming	Public Service Commission of SC											✓	
44.	G. O'Neal Hamilton	Public Service Commission of SC											✓	
45.	John E. Howard	Public Service Commission of SC											✓	
46.	Randy Mitchell	Public Service Commission of SC											✓	
47.	C. Robert Moseley	Public Service Commission of SC											✓	
48.	David A. Wright	Public Service Commission of SC											✓	
49.	Mike Gentry	Salt River Project	✓											
50.	J.T. Wood	Southern Company Services, Inc.	✓											
51.	Marc Butts	Southern Company Services, Inc.	✓											
52.	Roman Carter	Southern Company Services, Inc.	✓											
53.	Robert Jones	Southern Company Services, Inc.	✓											
54.	Kathy Davis	Tennessee Valley Authority	✓											
55.	Sue Mangum Goins	Tennessee Valley Authority	✓											
56.	Earl Shockley	Tennessee Valley Authority	✓											
57.	Jerry Landers	Tennessee Valley Authority	✓											
58.	Mark Creech	Tennessee Valley Authority	✓											
59.	Ellis Rankin	TXU Electric Delivery Company	✓											
60.	Travis Besler	TXU Electric Delivery Company	✓											
61.	Nancy Bellows (WACM)	WECC Reliability Coordination Comments Work Group		✓										
62.	Terry Baker (PRPA)	WECC Reliability Coordination Comments Work Group		✓										
63.	Tom Botello (SCE)	WECC Reliability Coordination Comments Work Group		✓										
64.	Richard Ellison (BPA)	WECC Reliability Coordination Comments Work Group		✓										
65.	Mike Gentry (SRP)	WECC Reliability Coordination Comments Work Group		✓										
66.	Robert Johnson (PSC)	WECC Reliability Coordination		✓										

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Commenter		Organization	Industry Segment											
			1	2	3	4	5	6	7	8	9	10		
		Comments Work Group												
67.	Greg Tillitson (CMRC)	WECC Reliability Coordination Comments Work Group		✓										
68.	Martin Trence	Xcel Energy – NSP	✓											

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2. Do you agree with the scope of the proposed project? (The scope includes all the items noted on the 'Standard Review Forms' attached to the SAR as well as other improvements to the standards that meet the consensus of stakeholders, consistent with establishing high quality, enforceable, and technically sufficient bulk power system reliability standards.) ..... 9
3. Please identify any additional revisions that should be incorporated into this set of standards, beyond those that have already been identified in the SAR. .... 1715

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

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

<b>Question #1</b>			
<b>Commenter</b>	<b>Yes</b>	<b>No</b>	<b>Comment</b>
ITC Transmission		<input checked="" type="checkbox"/>	Many of the items in the "To Do" lists appear administrative in nature, and not necessarily rooted in a reliability need. The requirements could use some upgrading, yes, but the need does not appear to be purely reliability-related.
<b>Response:</b> NERC has developed the Reliability Standards Development Work Plan and this SAR is in support of that effort. While some of the work is administrative in nature, it is believed that it will improve the standards and make them clearer, measurable and more consistent. As we move forward through the standards development effort itself, we believe that the true reliability benefits will come forward.			
Entergy Services, Inc.		<input checked="" type="checkbox"/>	We believe there is not a reliability-related need to upgrade the requirements in this set of standards. We do agree these standards need to be reviewed and revised to make them better standards.
<b>Response:</b> NERC has developed the Reliability Standards Development Work Plan and this SAR is in support of that effort. While some of the work is administrative in nature, it is believed that it will improve the standards and make them clearer, measurable and more consistent. As we move forward through the standards development effort itself, we believe that the true reliability benefits will come forward.			
Ameren		<input checked="" type="checkbox"/>	No additional comments.
Salt River Project	<input checked="" type="checkbox"/>		Admittedly, there are some "holes" in the current version.
<b>Response:</b> The SAR DT thanks the commenters and as shown in the previous response, we believe that there is a reliability-related need to continue the work.			
WECC Reliability Coordination Comments Work Group	<input checked="" type="checkbox"/>		There are gaps in the current version.
<b>Response:</b> The SAR DT thanks the commenters and as shown in the previous response, we believe that there is a reliability-related need to continue the work.			
Kansas City Power & Light Company	<input checked="" type="checkbox"/>		There are reliability-related reasons to upgrade the requirements in these standards.
<b>Response:</b> The SAR DT thanks the commenters and as shown in the previous response, we believe that there is a reliability-related need to continue the work.			
American Transmission Company	<input checked="" type="checkbox"/>		TC agrees that an upgrade is needed on this set of standards.
<b>Response:</b> The SAR DT thanks the commenters and as shown in the previous response, we believe that there is a reliability-related need to continue the work.			

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<b>Question #1</b>			
<b>Commenter</b>	<b>Yes</b>	<b>No</b>	<b>Comment</b>
Midwest ISO, Inc.	<input checked="" type="checkbox"/>		We agree that the restoration-related standards need improvement.
<b>Response:</b> The SAR DT thanks the commenters and as shown in the previous response, we believe that there is a reliability-related need to continue the work.			
Tennessee Valley Authority	<input checked="" type="checkbox"/>		<p>We do not agree that there should be a requirement for an RC Restoration Plan in EOP-005. It may be appropriate to add a requirement in 005 that says the RC is aware of the TO and BA Plans but is not bound to it as they are looking at the bigger picture. The requirements in EOP-006, for the RC's role in System Restoration, are sufficient and as long as the Functional Model separates entities then it is appropriate for their requirements to be in separate standards as we see it.</p> <p>There is a "mix of requirements" between Advance Planning and Real-Time activities and we think they need to be separated with section headings for the two.</p> <p>We don't understand what the "fill-in-the-blank" components are.</p> <p>We don't agree that Attachment 1 from EOP-005 should be moved into the requirements of the Standard. Instead, the industry should be asked to submit what they think should be included.</p>
<p><b>Response:</b> This comment is pertinent to the actual standards development and we will pass this comment on to the eventual Standards Drafting Team (SDT) for consideration when applicability is reviewed. We do believe that the RC does have a role in restoration planning.</p> <p>This SAR covers four different existing standards that do move between planning and real-time and the distinctions will be made clear as the standards are revised.</p> <p>"Fill-in-the-blank" refers to NERC standards that delegated requirements to regional entities. The NERC Regional Reliability Standards Working Group identified these standards as having 'fill-in-the-blank' requirements that need to be modified. The actual revision of Attachment I and its move to requirements is an action for the SDT to consider after hearing comments from the industry.</p>			
Manitoba Hydro	<input checked="" type="checkbox"/>		There is too much ambiguity in the requirements and measures, plus some requirements may allow too much leeway which may affect reliability of restoring the system. It is also not clear which standard is being reviewed; ie. the SAR form lists the first standard as EOP-005-0 but the comments are based on EOP-005-1.
<b>Response:</b> The SAR DT agrees with the comments. The SAR will be amended to state that EOP-005-1 is the standard to be reviewed.			
Xcel Energy – NSP	<input checked="" type="checkbox"/>		The structure of these and a few additional standards need to be revised to reflect a more realistic approach to planning, real-time execution, and measurable compliance to system restoration standards.

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<b>Question #1</b>			
<b>Commenter</b>	<b>Yes</b>	<b>No</b>	<b>Comment</b>
<b>Response:</b> The SAR DT agrees with the comments.			
Entergy Services, Inc.	<input checked="" type="checkbox"/>		
Alberta Electric System Operator	<input checked="" type="checkbox"/>		
IRC Standards Review Committee	<input checked="" type="checkbox"/>		
Hydro One Networks Inc.	<input checked="" type="checkbox"/>		
MISO Emergency Preparedness and System Restoration Working Group	<input checked="" type="checkbox"/>		
NPCC CP9 Reliability Standards Working Group	<input checked="" type="checkbox"/>		
Dominion Virginia Power	<input checked="" type="checkbox"/>		
Southern Company Services, Inc.	<input checked="" type="checkbox"/>		
NSTAR Electric	<input checked="" type="checkbox"/>		
American Electric Power	<input checked="" type="checkbox"/>		
ISO New England	<input checked="" type="checkbox"/>		
Progress Energy Carolinas	<input checked="" type="checkbox"/>		
Public Service Commission of SC	<input checked="" type="checkbox"/>		
Independent Electricity System Operator	<input checked="" type="checkbox"/>		
TXU Electric Delivery Company	<input checked="" type="checkbox"/>		



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

**Summary Consideration:** While most commenters agreed with the scope of the proposed project, there were several commenters who indicated the scope needs more clarity and the drafting team made the following modifications to the SAR:

- Replaced references to EOP-005-0 with EOP-005-1
- Replaced references to EOP-006-0 with EOP-006-1

Added a paragraph to the 'Brief Description' to clarify that work will not be limited to the issues already identified on what was called the 'to do list'.

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 staff in evaluating the quality of existing standards.

Question #2			
Commenter	Yes	No	Comment
Tennessee Valley Authority		<input checked="" type="checkbox"/>	All of the "Standard Review Forms" refer to the Version 0 documents...why not include the Version 1 that is due to go into affect in '07 for EOP-005 and EOP-006?
<b>Response:</b> This was an error and the SAR will be amended to handle the -1 versions.			
ITC Transmission		<input checked="" type="checkbox"/>	The scope of the SAR for EOP-006, 007, and 009 are overly vague. The scope of the SAR is indiscernable. The scope of the SAR for EOP-005 appears to desire industry debate on several topics more than it desires to actually upgrade a standard.
<b>Response:</b> The SAR DT appreciates these comments and we have considered them in our revision of the SAR. NERC has developed the Reliability Standards Development Work Plan and this SAR is in support of that effort. It is believed that it will improve the standards and make them clearer, measurable and more consistent. The scope of the SAR is designed to provide the SDT with sufficient flexibility to address all necessary revisions. Work is not to be limited to the 'To Do List', nor are the items identified there mandatory revisions.			
IRC Standards Review Committee	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	The SRC would suggest that the SAR be clear that it will be a complete review of the subject requirements: to include the addition, deletion and modification of requirements as agreed to by public consensus and not be limited to the "TO DO LIST" identified in this draft.
<b>Response:</b> The SAR DT appreciates these comments and we have considered them in our revision of the SAR. NERC has developed the Reliability Standards Development Work Plan and this SAR is in support of that effort. It is believed			

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Question #2			
Commenter	Yes	No	Comment
<p>that it will improve the standards and make them clearer, measurable and more consistent.                      The scope of the SAR is designed to provide the SDT with sufficient flexibility to address all necessary revisions. Work is not to be limited to the 'To Do List', nor are the items identified there mandatory revisions.</p>			
MISO Emergency Preparedness and System Restoration Working Group		<input checked="" type="checkbox"/>	The scope of this project should not be limited to just revising four Standards due to directives from regulatory bodies, but should be flexible to meet industry needs, whether additional or fewer Standards are required to address System Restoration and Blackstart needs. Review and modification of other existing Standards may be required (e.g.EOP-001).
<p><b>Response:</b> The SAR DT appreciates these comments and we have considered them in our revision of the SAR. NERC has developed the Reliability Standards Development Work Plan and this SAR is in support of that effort. It is believed that it will improve the standards and make them clearer, measurable and more consistent.                      The scope of the SAR is designed to provide the SDT with sufficient flexibility to address all necessary revisions. Work is not to be limited to the 'To Do List', nor are the items identified there mandatory revisions.                      Changes to other standards such as EOP-001 can be identified and passed on to the appropriate drafting team(s).</p>			
Southern Company Services, Inc.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	There is a concern that the SAR process is being skipped over (due to the granular nature of the recommendation changes) and the changes being recommended are more inclined to be addressed by the Standard (not SAR) drafting team. The SAR is not "clearly defining the scope". For example, they have started attaching some documents with the title "Standard Review Form". Those documents contain comments generated by FERC, NERC, and the industry. However, the SAR does not say whether these comments must be accomodated or whether they just need to be considered.
<p><b>Response:</b> The SAR DT appreciates these comments and we have considered them in our revision of the SAR. NERC has developed the Reliability Standards Development Work Plan and this SAR is in support of that effort. It is believed that it will improve the standards and make them clearer, measurable and more consistent.                      The scope of the SAR is designed to provide the SDT with sufficient flexibility to address all necessary revisions. Work is not to be limited to the 'To Do List', nor are the items identified there mandatory revisions.</p>			
Manitoba Hydro		<input checked="" type="checkbox"/>	Manitoba Hydro believes these standards need to be as high quality as possible, as consistent as possible and have the measurements in place to ensure reliability. This SAR should require that Violation Risk Factors (VRF's) be assigned to all the requirements in the revised standards and that the VRF's be included in the revised standards. This can be coordinated with the current activity on.

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<p><b>Response:</b> The SAR DT appreciates these comments and we have considered them in our revision of the SAR. NERC has developed the Reliability Standards Development Work Plan and this SAR is in support of that effort. It is believed that it will improve the standards and make them clearer, measurable and more consistent. The scope of the SAR is designed to provide the SDT with sufficient flexibility to address all necessary revisions. Work is not to be limited to the 'To Do List', nor are the items identified there mandatory revisions. The development of Violation Risk Factors are required as part of the Standards Development Process and will be included by the SDT.</p>			
Midwest ISO, Inc.		<input checked="" type="checkbox"/>	The scope should be more focused. Right now it looks like a laundry-list.
<p><b>Response:</b> The SAR DT appreciates these comments and we have considered them in our revision of the SAR. NERC has developed the Reliability Standards Development Work Plan and this SAR is in support of that effort. It is believed that it will improve the standards and make them clearer, measurable and more consistent. The scope of the SAR is designed to provide the SDT with sufficient flexibility to address all necessary revisions. Work is not to be limited to the 'To Do List', nor are the items identified there mandatory revisions.</p>			
Kansas City Power & Light Company		<input checked="" type="checkbox"/>	<p>The scope needs to be more focused.</p> <p>EOP-5 All comments under the various groups identified are not specific enough to respond to except the comments under "FERC NOPR", "FERC Staff", 4<sup>th</sup> bulleted item under "VO Industry Comments" and all bullets under "Phase III/IV Comments". Agree with all bulleted items under "FERC NOPR" and "FERC Staff". Do not agree with bulleted items 1-7 or 10-12 and agree with bulleted items 8 &amp; 9 under "Phase III/IV Comments". Regarding bulleted items 8 &amp; 9 under "Phase III/IV Comments", would recommend the testing and training periodicity for R5 and R6 be on an annual basis.</p> <p>Do not agree that Load Serving Entities or Generation Owners should have restoration plans. The proposed EOP-5 version 1 does not include any requirement or applicability for the LSE and GO and this is the way it should be.</p> <p>EOP-6 Agree with comments regarding the measures and the measures proposed in EOP-6 version 1. Do not agree with any of the other comments under "FERC NOPR" or "FERC Staff". The comments under "Regional Fill-in-the-Blank Team Comments" are not specific enough to respond to.</p>

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Question #2			
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<p><b>Response:</b> The SAR DT appreciates these comments and we have considered them in our revision of the SAR. NERC has developed the Reliability Standards Development Work Plan and this SAR is in support of that effort. It is believed that it will improve the standards and make them clearer, measurable and more consistent. The scope of the SAR is designed to provide the SDT with sufficient flexibility to address all necessary revisions. Work is not to be limited to the 'To Do List', nor are the items identified there mandatory revisions.</p>			
Entergy Services, Inc.		<input checked="" type="checkbox"/>	<p>There are several issues within the proposed SAR that concern scope, timing and sequence.</p> <p>Attachment 1 of EOP-005 contains elements that should be reviewed in the development of a restoration plan. However, we disagree with the SAR authors that - the conditions under which an entity is exempt from including an element in its system restoration plan need to be specified - should be deleted. All the reasons that a developer may need for not including an element can not be specified nor included in the requirements of a standard or a plan.</p> <p>The second paragraph of the Brief Description contains a statement that in EOP-005 the RC does not have any requirement to have a system restoration plan. We are not sure what the authors mean by this vague statement. However, we think it is appropriate and correct that the RC does not have a system restoration plan. We agree with the existing standards that the TOP and BA have restoration plans as required in EOP-005 and the RC assists with coordinating the implementation of those plans as required in EOP-006. Therefore, please delete the second paragraph of the Brief Description.</p> <p>The second sentence of the third paragraph of the Brief Description contains a statement about ensuring the lines of authority clarified under the RC (Project 2006-03) and Real-time Transmission Operations and Balancing of Load and Generation (Project 2007-03) are fully supported in the refinement of this set of standards. This sentence should be deleted. The SAR contains something identified as Project 2006-03 System Restoration and Blackstart which does not seem to address the lines of authority of the RC. In addition, there is no Project 2007-03 in the SAR so we can not agree to making the EOP standards conform to requirements that are not available. In addition, the lines of authority of the RC should be contained in EOP-006.</p>

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<b>Question #2</b>			
<b>Commenter</b>	<b>Yes</b>	<b>No</b>	<b>Comment</b>
			<p>We agree with the idea that the fill-in-the-blank components of EOP-007 and EOP-009 should be filled in, which is what we think is meant by the term "eliminate". We do not agree with the elimination of the fill-in-the-blanks if the authors really meant.</p> <p>We are concerned about the open-ended statements in the SAR. The statement that - development may include other improvements to the standards deemed appropriate - should contain a statement that those other improvements will be limited to the standards and requirements identified in this SAR, and approval of this SAR is not an open-ended approval to change standards and requirements other than the standards identified in this SAR in other standards that directly concern system restoration and are directly applicable to this approved SAR.</p>
<p><b>Response:</b> We agree that that the brief description needs to be revised for clarity and have addressed that in the revised SAR.                      The scope of the SAR is designed to provide the SDT with sufficient flexibility to address all necessary revisions.</p>			
Dominion Virginia Power		<input checked="" type="checkbox"/>	<p>Contrary to what the SAR says, there is indeed a requirement for Reliability Coordinators to have System Restoration Plans. In fact, requirement R3 of EOP-006 states, "The Reliability Coordinator shall have a Reliability Coordinator Area restoration plan that provides coordination between individual Transmission Operator restoration plans and that ensures reliability is maintained during system restoration events." With this requirement, it is not necessary for RCs to have restoration plans that are equivalent to the TO and BA plans. However, RCs must be involved in the development and approval of the TO and BA plans in order to ensure that the RC's over-arching plan is viable and actually maintains reliability during system restoration events.</p>
<p><b>Response:</b> We do believe that the Reliability Coordinator does have a role in restoration planning. The SAR DT believes that at a minimum there should be coordination between the various parties.</p>			
Xcel Energy – NSP		<input checked="" type="checkbox"/>	<p>It is questionable if the concept of a "Regional Restoration Plan" should remain in existence as the responsibility of implementing restoration plans lie with the Transmission Operator, Balancing Authority, Generator Operator (where applicable), and Reliability Coordinator. A Regional Reliability Organization is not structured to implement system restoration plans, their function has evolved for the most part to set standards and perform in conjunction with the ERO compliance monitoring. There are also critical utility infrastructure issues that need to be addressed in the sharing of restoration plans.</p>

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<p><b>Response:</b> The SAR DT appreciates these comments and we have considered them in our revision of the SAR. We do believe that the Reliability Coordinator does have a role in restoration planning. The SAR DT believes that at a minimum there should be coordination between the various parties.</p>			
American Transmission Company	<input checked="" type="checkbox"/>		<p>The SAR DT needs to provide a more detailed explanation as to the role of each entity that is checked under the "Reliability Functions" section, particularly those roles that have not been identified under the Applicability section for these Standards in the past, such as Planning Authority, Distribution Provider and Load Serving Entity.</p> <p>The SAR should task the SDT with developing a comprehensive set of standards that address blackstart planning, testing and coordination. In order to perform this task the team should be given wide latitude in developing a new set of standards and requirements. Therefore the SAR should not limit the team to organize its work within a predefined number of standards as more standards may be required to address the roles of new entities not subject to these standards in the past.</p> <p>Does the SDT envision any major changes to the roles currently performed by the Transmission Operator, Balancing Authority, Reliability Authority, Generator Owner, Generator Operator? If so, what are they?</p> <p>Finally, ATC believes that any proposed requirements for parties to execute contractual agreements, as described under "Phase III/IV comments," are outside the scope and purview of the SDT.</p> <p>EOP-007-0</p> <p>ATC agrees that this standard should not apply to the RRO. ATC suggests that the SDT review Standard EOP-007-0 in terms of having the Reliability Coordinator perform those tasks currently performed by the RRO.</p> <p>EOP-005-1 (Attachment 1)</p> <p>Lastly, ATC would like to see a change to one of the sentences in the Brief Discription section of the SAR.</p>

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Question #2			
Commenter	Yes	No	Comment
			<p>Third Sentence of the First Paragraph:</p> <p>"The Elements in the attachment need to be reviewed and the condition under which an entity is exempt...."</p> <p>Suggested Change:</p> <p>The elements in the attachment need to specify which entities are responsible for each element listed.</p>
<p><b>Response:</b> The SAR DT appreciates these comments and we have considered them in our revision of the SAR. We do believe that the Reliability Coordinator does have a role in restoration planning. The SAR DT believes that at a minimum there should be coordination between the various parties.</p> <p>The scope of the SAR is designed to provide the SDT with sufficient flexibility to address all necessary revisions. Work is not to be limited to the 'To Do List', nor are the items identified there mandatory revisions.</p>			
Ameren	<input checked="" type="checkbox"/>		<p>Does this SAR apply to Reliability Standards EOP-005-0 and EOP-006-0, or to EOP-005-1 and EOP-006-1?</p> <p>We do not see a benefit to adding LSE's to the Applicability section of EOP-005-1, and we do not believe adding LSE's to R4 of EOP-005-1 would contribute to the effectiveness of the restoration plan, and would make implementation of the plan more onerous.</p> <p>We do not agree with deleting R11.5.4 of EOP-005-1. However, this item should be retained as a consideration, not a requirement.</p>
<p><b>Response:</b> The SAR will be amended to state that the current standards will be reviewed. The SAR DT appreciates these comments and we have considered them in our revision of the SAR.</p>			
WECC Reliability Coordination Comments Work Group	<input checked="" type="checkbox"/>		<p>The group agrees with the scope of the proposed project, but feels that clarification of the portion of blackstart and restoration plans that the reliability coordinator approves needs to be restricted to a reasonable expectation. The Reliability Coordinator should review and approve only those portions of individual restoration plans that establish the backbone power system. There is no need for the Reliability Coordinator to be responsible for detailed plans of the BA, TO, GOP, LSE, etc. Specify the portions of the individual plans that need Reliability Coordinator review and approval.</p>
<p><b>Response:</b> The SAR DT appreciates these comments and we have considered them in our revision of the SAR. We do believe that the Reliability Coordinator does have a role in restoration planning. The SAR DT believes that at a minimum there</p>			

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<b>Question #2</b>			
<b>Commenter</b>	<b>Yes</b>	<b>No</b>	<b>Comment</b>
<a href="#">should be coordination between the various parties.</a>			
Salt River Project	<input checked="" type="checkbox"/>		The scope appears reasonable in order to provide measurable requirements.
Entergy Services, Inc.	<input checked="" type="checkbox"/>		
Alberta Electric System Operator	<input checked="" type="checkbox"/>		
Hydro One Networks Inc.	<input checked="" type="checkbox"/>		
NPCC CP9 Reliability Standards Working Group	<input checked="" type="checkbox"/>		
ISO New England	<input checked="" type="checkbox"/>		
Progress Energy Carolinas	<input checked="" type="checkbox"/>		
Independent Electricity System Operator	<input checked="" type="checkbox"/>		
NSTAR Electric	<input checked="" type="checkbox"/>		
American Electric Power	<input checked="" type="checkbox"/>		
Public Service Commission of SC	<input checked="" type="checkbox"/>		
TXU Electric Delivery Company	<input checked="" type="checkbox"/>		



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

**Summary Consideration:** Commenters provided several addition suggestions for items that should be addressed by the standard drafting team and the SAR was modified to reflect these additions.

<b>Question #3</b>			
<b>Commenter</b>	<b>Yes</b>	<b>No</b>	<b>Comment</b>
American Transmission Company		<input checked="" type="checkbox"/>	References to Standard EOP-005-0 (Version 0) should be replaced with EOP-005-1 (Version 1) which will be effective on January 1, 2007.  References to Standard EOP-006-0 (Version 0) should be replaced with EOP-006-1 (Version 1) which will be effective on January 1, 2007.
<b>Response:</b> The SAR will be amended to state that the current standards will be reviewed. The SAR DT appreciates these comments and we have considered them in our revision of the SAR.			
IRC Standards Review Committee			The SRC agrees that there is a need to review, upgrade and revise the Restoration and Blackstart set of standards. However, the SRC would also recommend the SAR be rewritten to clearly describe the scope of process being proposed.  At a minimum, the SAR should identify which standards will be under review: the version 0 or version 1 standards. It is unclear if and why EOP-005-0 and EOP-006-0 would be reviewed rather than EOP-005-1 and EOP-006-1.
<b>Response:</b> The SAR will be amended to state that the current standards will be reviewed. The SAR DT appreciates these comments and we have considered them in our revision of the SAR.			
Tennessee Valley Authority		<input checked="" type="checkbox"/>	
WECC Reliability Coordination Comments Work Group		<input checked="" type="checkbox"/>	
Salt River Project		<input checked="" type="checkbox"/>	
Alberta Electric System Operator	<input checked="" type="checkbox"/>		The AESO recommends the following revisions to be incorporated:  1. The SAR should refer to the most updated and current standards. Let's say EOP-005-1 and EOP-006-1 and not EOP-005-0 and EOP-006-0 2. Considering adding definitions to EOP-005-1 for: - Partial or total shut down;

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<b>Question #3</b>			
<b>Commenter</b>	<b>Yes</b>	<b>No</b>	<b>Comment</b>
			<p>- Vital telecommunications channels;                      - System restoration;                      - Blackstart capability plan; and                      - System restoration plan.</p> <p>3. Consider adding a requirement for Generator Operators to have generating facilities blackstart procedures. Those procedures shall be coordinated with the Transmission Operator's System Restoration plan</p> <p>4. Consider revising training in R6. Training requirements should be quoted as stated and required in a different standard, let's say PRC. And with regards to training, it shall be state "what" should be the minimum training required for TO, BA and Generating facilities. And also, clarification as "what" is expected as "simulated exercises". What are those? It is DTS what is required? Or is it a table top adequate?</p> <p>5. Consider defining what is as a minimum required criteria for "simulated exercises" in the understanding that it will not be practical to perform "an actual test" to the entire restoration plan. Further more, What is the meaning for simulation? DTS? Power flows? EMTP? Other?</p> <p>6. Consider revising EOP-005-1 R9 "switching requirements" and trying not to be prescriptive in telling the "hows" instead of the "what" is required to comply with. The requirement should no be a "cook book". If considering keeping this requirement, then consider defining "switching requirements".</p> <p>7. Consider revising EOP-005-1 R10 in order to clarify "simulation testing"</p>
<p><b>Response:</b> The SAR will be amended to state that the current standards will be reviewed. Consideration of definitions is left to the SDT and this comment will be added to the lists of issues passed on to that team. We have added the role of the GO and generating facilities procedures to the revised SAR. We feel that restoration training is a function of the PER standards and that standards should describe 'what' and not 'how'. We feel that there is sufficient flexibility in the SAR to handle the comments made in points 5 through 7 when the actual standard revision work starts.</p>			
Hydro One Networks Inc.  Independent Electricity System Operator  ISO New England	<input checked="" type="checkbox"/>		<p>In EOP-5, Compliance, Section 1.4.1 -Hydro One requests clarification of the phrase "critical load requirements".</p> <p>The phase can be interpreted as:</p> <p>(i) available and easily accessible loads to be restored for voltage control in network restoration on the bulk power system level. These are loads employed to expedite the restoration of the interconnection.</p> <p>(ii) loads of importance to health/safety/national security - police, hospitals, govt.</p>

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<b>Question #3</b>			
<b>Commenter</b>	<b>Yes</b>	<b>No</b>	<b>Comment</b>
NSTAR Electric NPCC CP9 Reliability Standards Working Group			<p>offices. These are really distribution loads that are restored once the interconnection is restored and the transmission system is rebuilt. (iii) restoring off-site power to key transmission facilities.</p> <p>We suggest that mention of critical loads should be replaced by the restoration of critical transmission and generation facilities necessary to restore load.</p> <p>With regard to the Phase III/IV comments on EOP-005 Restoration Plans:</p> <p>(1) Locking the restoration to single, contractual cranking path.</p> <p>A robust restoration plan must be flexible. It is impossible to define in advance what equipment will be available for service in the aftermath of a system collapse.</p> <p>The concept of an explicitly defined cranking path, locked into a restoration plan by contractual requirements, precludes flexibility and is restrictive-further complicating what may be an intricate process. Identifying and communicating and coordinating the intended cranking path is a valid aspect of restoration. This is included in the second bullet of the Phase III/IV comments. The fourth bullet of the Phase III/IV comments should be removed from the SAR.</p> <p>2) R3- Placing emphasis on restoring local transmission.</p> <p>There is no need for the bullet on R3. The recommendation as noted encourages the restoration of local transmission and load at a higher priority than reestablishing the interconnection. Restoring the interconnection is the highest priority. In the process of achieving that end, some, minimal restoration of local transmission will be involved.</p> <p>This is in direct conflict with the industry comments on V0 Standards which requires modifications to assign priority to the integrity of the interconnection.</p> <p>Changing the emphasis of R3 should be removed from the SAR.</p> <p>3) R11.5- Placing local load restoration above re-establishing the interconnection.</p>

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Question #3			
Commenter	Yes	No	Comment
			<p>This follows the same argument addressed above. Restoration of the interconnection is a higher priority than the restoration of local load.</p> <p>R11.5 should be retained in the SAR.</p> <p>R6 mentions providing training requirements however this training requirement is already in PER-002-R3.1. There is also a training requirement in PER-004 R4 for the RC requirement.</p>
<p><b>Response:</b> We feel that the comments made are applicable to the standards effort and have added new issues to the lists to be passed on to the standard drafting team. The SAR contains sufficient flexibility to allow the SDT to address these issues at the appropriate time.</p>			
Independent Electricity System Operator	<input checked="" type="checkbox"/>		<p>Comments on EOP-006 &amp; EOP-007 Standards:</p> <p>EOP 006-1 R3 states "The Reliability Coordinator shall have a Reliability Coordinator Area restoration plan that provides coordination between individual Transmission Operator restoration plans and that ensures reliability is maintained during system restoration events."</p> <p>EOP 007 R1 states "Each Regional Reliability Organization shall establish and maintain a system BCP, as part of an overall coordinated Regional SRP...."</p> <p>Is it an acceptable practice for a Reliability Coordinator, in approving its Transmission Operator restoration plans per appropriate assessment criteria and ensuring they enable coordinated restoration with the interconnections, be deemed as an alternative to creating and maintaining regional plans? Otherwise the scope of such regional plans should be specified to limit their scale. Consider the large number of Transmission Operators (and restoration plans) in those Reliability Coordinator Areas with large footprints such as PJM, MISO and California ISO.</p> <p>The same consideration applies to a Regional Black Start Capability Plan as assessed by the Regional Reliability Organization. Given that black start is integral to system restoration how it is proposed to be handled in instances where the Reliability Coordinator Area differs from the RRO boundary?</p> <p>Additionally, EOP 006-1 should capture Reliability Coordinator to other Reliability</p>

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<b>Question #3</b>			
<b>Commenter</b>	<b>Yes</b>	<b>No</b>	<b>Comment</b>
			Coordinator 'coordination'. Specifically, "Reliability Coordinators shall coordinate their system restoration plans and efforts together including joint participation in drills and exercises."
<p><b>Response:</b> We feel that the comments made are applicable to the standards effort and have added new issues to the lists to be passed on to the standard drafting team. The SAR contains sufficient flexibility to allow the SDT to address these issues at the appropriate time.</p>			
MISO Emergency Preparedness and System Restoration Working Group	<input checked="" type="checkbox"/>		Regional Reliability Organizations (RRO's) do not have an active role in Emergency Operations, the applicability of EOP - 007 for RRO's is questionable. The requirements in EOP-007 should be applicable to the Reliability Coordinator function as it has the responsibility of maintaining integrity of the Bulk Electric System over a wide area and must coordinate its activities with its neighboring Reliability Coordinators.
<p><b>Response:</b> We agree with the comment and the revised SAR reflects this.</p>			
Dominion Virginia Power	<input checked="" type="checkbox"/>		The existing standards (and the Functional Model) do not address the role of the Transmission Owner in system restoration. For example, assessment of the extent of isolation of a storm-ravaged system usually requires "boots on the ground" if normal data/voice communications are disrupted. Also, assessments of transmission asset damage requires visual inspections. Typically, it is Transmission Owner personnel who perform these assessments and inspections. Also, the repair of damaged transmission facilities and the determination of the readiness of those facilities to be re-energized is the responsibility of the asset owner. A determination of readiness for re-energization usually involves a re-examination of facility limits, calculation of short-circuit current availability, and an evaluation of protective relaying viability given the abnormal system topologies that can result from a major storm. These are typically Transmission Owner responsibilities. Transmission Owners have restoration plans to ensure that they are ready and able to perform these vital restoration tasks.
<p><b>Response:</b> We do not believe that the Transmission Owner has an obligation for system restoration. Repair of facilities is beyond the scope of system restoration in these standards. It is a business obligation for the asset owner. We believe that the responsible entity for system restoration as defined here is the Transmission Operator and that the Transmission Operator will coordinate with whatever parties it needs to in order to accomplish its assigned responsibilities.</p>			
Southern Company Services, Inc.	<input checked="" type="checkbox"/>		Some items that need to be considered is that in some of the comments it recommends "Add a requirement for..". Does this mean the standards drafting team must add a requirement or just have to consider adding the requirement and only do so if they think it is the right thing to do? Another example can be found in

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			the scope section. The following statement is made: "EOP-005 only requires the Transmission Operator and the Balancing Authority to have a system restoration plan - the Reliability Coordinator does not have any requirement to have a system restoration plan." That is all that is said about it. Does this compel the standards drafting team to add a requirement for the Reliability Coordinator? Or does it merely mean that the SDT should consider adding a requirement? These examples need to be clear to the drafting team.
<p><b>Response:</b> The scope of the SAR is designed to provide the SDT with sufficient flexibility to address all necessary revisions. Work is not to be limited to the 'To Do List', nor are the items identified there mandatory revisions. We do believe that the Reliability Coordinator does have a role in restoration planning. The SAR DT believes that at a minimum there should be coordination between the various parties.</p>			
Progress Energy Carolinas	<input checked="" type="checkbox"/>		<p>EOP-005:</p> <ol style="list-style-type: none"> <li>1. Requirements in EOP-005 should include a definition of "periodically." We would recommend a periodicity of annually to coincide with annual requirement to review and update the restoration plan at least annually.</li> <li>2. R3 could be rolled into R1.</li> </ol> <p>EOP-006:</p> <p>The SAR indicates actions should be defined for R6. The actions taken to restore normal operations would depend on the operating emergency. Prescriptive actions should be avoided.</p>
<p><b>Response:</b> We feel that the comments made are applicable to the standards effort and have added these issues to the lists to be passed on to the standard drafting team. The SAR contains sufficient flexibility to allow the SDT to address these issues at the appropriate time.</p>			
Xcel Energy – NSP	<input checked="" type="checkbox"/>		Additional Standards that make reference to System Restoration Plans (e.g. EOP-001) should be reviewed and such references be removed from those standards as they are redundant, distracting, and provide no additional support to these standards being addressed in this SAR.
<p><b>Response:</b> Changes to other standards such as EOP-001 can be identified and passed on to the appropriate drafting team(s).</p>			
Manitoba Hydro			<p>EOP-005-0 and -1</p> <p>Applicability - This should apply to Reliability Coordinators as well as TOs and BAs.</p> <p>R1 (-0 + -1) - As part of integrating the appendix items into the requirements section the last sentence of R1 could be eliminated.</p> <p>R5 (-0 + -1) - I think the testing period of the telecommunications systems should</p>

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			<p>be defined as well as the type of testing that needs to be done. If auditors start asking questions about tests that are not defined or required its not fair to the entity being audited if they haven't performed that particular test. It should also be identified if main or backup systems need to be tested or if there should be backup systems.</p> <p>R6 (-0 + -1) - Reliability Coordinator needs to be included in the training of personnel as part of this standard. Also the type of training needs to be defined (simulations, table top exercises), and the base topics to be trained on (philosophy, building of islands, blackstart) should be defined.</p> <p>R7 (-0 + -1) - The type of testing or simulations should be defined; should dynamic stability studies, as well as voltage and frequency studies be done on the restoration plans or is running a simulation sufficient, unfortunately a simulation doesn't give you a complete enough evaluation.</p> <p>R8 (-0) - availability and location aren't enough to ensure the blackstart units can do the job, you also have to ensure the capability of the units and the number of units are sufficient to blackstart. Testing and studies need to be done to ensure the units can accomplish the task.</p> <p>R8 (-1) - Verification should be done by dynamic, voltage and frequency studies. Verification that the blackstart units are capable should be included with the "number, size, and location". The RRO isn't included in the Applicability section yet is looks like its their plan that the TO should be meeting instead of meeting the TO plan.</p> <p>R9 (-1) - Its not clear as to which units this requirement is refering to, is it refering to a remote blackstart unit or other units on the system that need to be started as part of restoring the system?</p> <p>R9.4 (-0) and R11.4 (-1) - For systems that have nuclear stations it should be made a part of their plans to give restoration of off-site power to the plants a high priority.</p> <p>R9.5.1 (-0) and R11.5.1 (-1) - When tying two islands together the emphasis should be on minimizing the flow through the tie point once synched and closed rather than when voltage, frequency and phase angle permit. The resultant flow could be greater than expected if the system operator simply relies on the relaying to allow closing. Special attention should be paid to frequency and voltage when tying islands and bringing them as close as possible together prior to closing.</p> <p>R9.5.4 (-0) and R11.5.4 (-1) - Typically is not the surrounding areas that require shedding of load to reconnect. The surrounding areas usually means the stable or</p>

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<b>Question #3</b>			
<b>Commenter</b>	<b>Yes</b>	<b>No</b>	<b>Comment</b>
			<p>larger of areas meaning frequency in the surrounding areas should be good to start with. It's the area that want to synch that should be adding generation or shedding load to be able to synch with the surrounding areas.</p> <p>R10 (-1) - The word simulation comes up again, it should be defined what simulation is or whether its really referring to studies as done by system performance such as dynamic stability studies.</p> <p>C. Measures (-1) M1. - Should read studies instead of simulations.</p> <p>D. Compliance, 1.1.1 (-0) and 1.4.1 (-1) - its not clear what is meant by "identification of critical requirements", is it just identifying where critical loads exist so they can be brought on as part of the restoration process or do the voltage and frequency requirements of each critical load have to be identified as part of the restoration plan.</p> <p>1.4.6 (-1) - the units to be started should be clarified.</p> <p>1.4.7 (-1) - should refer to the TO restoration plan. If the regional plan is included there needs to be a requirement to share the regional plan with the TOs.</p> <p>Attachment 1-EOP-005-0 and attachment EOP-005 - 3. - It would be impractical to have a plan for every possibility.</p> <p>6. - Should this not fall under the dynamic type studies done by engineering studies personnel. To what extent should plans be simulated or tested?</p> <p>EOP-006-0 and -1</p> <p>R1 (-0) and (-1) - The RC should be more than just aware, the Reliability Coordinator's system restoration plan should coordinate with the TO's plan so the RC should thoroughly knowledgeable with the TO plans.</p> <p>R5 (-0) and (-1) - "major system islands" needs to be defined, at what point the RC gets involved needs to be clear. They don't necessarily need to be involved with the location of the synchronization point (the TOs should be aware of where they can synchronize).</p> <p>EOP-007-0</p> <p>R1.2 - Simulation doesn't give the dynamic response the proper studies can give (ie; dynamic stability studies, voltage and frequency studies).</p> <p>R1.3.1 - What if it's the same one third that gets tested each year, the remaining two thirds may not be usable when the time comes to do a real restoration. You can't assume that each year a different one third will be tested. Also in order to</p>



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<b>Commenter</b>	<b>Yes</b>	<b>No</b>	<b>Comment</b>
			<p>provide training to plant personnel testing all blackstart units each year will ensure more plant operators are trained in the procedure.                      R1.3.2 - this needs to be more specific as to the type of testing required.                      Footer 1 - this should be included in the requirements section.</p> <p>EOP-009-0                      R1 - Besides the RRO the TO has blackstart requirements that need to be met.</p>
<p><b>Response:</b> We feel that the comments made are applicable to the standards effort and have added these issues to the lists to be passed on to the standard drafting team. The SAR contains sufficient flexibility to allow the SDT to address these issues at the appropriate time.                      We do believe that the Reliability Coordinator does have a role in restoration planning. The SAR DT believes that at a minimum there should be coordination between the various parties.</p>			
Ameren			The VRF comments to EOP-005-1 are confusing. It is not certain to what these comments refer.
<p><b>Response:</b> We feel that the comments made are applicable to the standards effort and have added these issues to the lists to be passed on to the standard drafting team. The SAR contains sufficient flexibility to allow the SDT to address these issues at the appropriate time.</p>			
Midwest ISO, Inc.			<p>This does not appear to be a yes-no question and may be an indication of the haste in putting this together. There are some good things mentioned in the SAR (better training, involvement of LSEs and Generators, etc.), but it appears this may well get out of control. The intent is to prepare for restoration, not to add scores of administrative requirements. We are concerned about the suggestion to have "blackstart agreements " and "cranking path agreements". Since we don't know how an event will evolve or propogate, restoration plans should be heavy on philosophy, simple to manage once implemented, and not overly prescriptive in detail. It appears this is going down a path to create a reference that will be used to second-guess operators after the fact when conditions require deviation from their plan.</p>
<p><b>Response:</b> The SAR DT thanks you for your comment and agrees that these are legitimate concerns.</p>			
Entergy Services, Inc.			<p>EOP-005 -?                      Should version 1 be the version subject to review and update?                      R1 - is the "loss of vital communications" necessary? This seems redundant to COM-001                      R2 - the comment about correcting deficiencies during simulation exercises seems out of place.                      R3 - how is "coordination" defined?</p>

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			<p>R10 &amp; 10.1 - does this include testing of the generators as specified in EOP-009? Is it the same? Need clarification on this.  VRFs need to be revisited. The proposed VRFs on the current ballot for the Standards have administrative tasks rated as HIGH.</p> <p>EOP-007-0  This standard contains requirements for a BCP that outlines blackstart unit testing requirements. Blackstart unit testing requirements should not be spread across several EOPs. Consolidate, Consider merging EOP-007 and 009, and the blackstart unit testing portions of EOP-005.</p> <p>EOP-009-0  See comments above.</p>
<p><b>Response:</b> The SAR will be amended to state that the current standards will be reviewed. We feel that the comments made are applicable to the standards effort and have added these issues to the lists to be passed on to the standard drafting team. The SAR contains sufficient flexibility to allow the SDT to address these issues at the appropriate time.</p>			
ITC Transmission			No comment.
TXU Electric Delivery Company			No comment.
Public Service Commission of SC			None identified.
Entergy Services, Inc.			No additional revisions at this time.
American Electric Power			None identified at this time.
Kansas City Power & Light Company			No comment.