

Comment Form — Second Draft of SAR for Backup Facilities

Please use this form to submit comments on the second draft of the SAR for Backup Facilities. Comments must be submitted by **March 16, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.com with the words "Backup Facilities" 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:	James H. Sorrels, Jr.	
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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 or 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 or Regional Entities

Background Information

The revised SAR clarifies that this project revises EOP-008-0, Plans for Loss of Control Center Functionality, to emphasize the continuation of functionality needed by Reliability Coordinators, Balancing Authorities, and Transmission Operators for reliable system operation regardless of the manner in which it is achieved.

The definition of backup capability that is pertinent to this effort is: the ability to maintain situational awareness and continue to comply with reliability standards when primary control center facilities are not operational, including consideration for communications required to explicitly support backup facilities.

The drafting team made several changes to the SAR based on stakeholder comments, including the following:

- Clarified that the work of the Operating Committee Backup Control Center Task Force will be used as one of the inputs to the revision of EOP-008
- Removed COM-001 from the list of standards included in the scope of this project
- Modified the SAR to clarify that there “may” be some requirements for backup capabilities in other reliability standards and added IRO-002 to the list of related standards because it does contain a backup facility requirement
- Clarified that Appendix B is an informative attachment that contains material for consideration in the standards revision process, but should not be considered to contain mandatory changes to the standard
- Clarified that the standard will apply to any entity for which the loss of its primary control capability would impose a significant real-time reliability risk to the Bulk Power System — and includes the Reliability Coordinator, Balancing Authority, Transmission Operator, and any entity (including the Transmission Owner) performing reliability functions as a result of delegation of tasks from those entities

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You do not have to answer all questions.

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

1. The revised SAR shows the Transmission Owner as an applicable entity based on the concept that there are Transmission Owners that operate control centers that could potentially have impact on the reliability of the Bulk Power System. Do you agree that the standard drafting team needs to have the flexibility to address the issue of Transmission Owners as applicable entities in the drafting of the standard?

Yes

No

Comments:

2. The SAR drafting team has deleted COM-001 from the revised SAR based on the fact that COM-001 deals with generic communication issues and not backup facility issues. Communication support explicitly needed for backup facilities will be considered in the revision of EOP-008. Also, COM-001 is covered in other areas of the Reliability Standards Development Plan 2007–2009. On this basis, do you agree that COM-001 should be deleted from the scope of this SAR?

Yes

No

Comments:

3. Please highlight any other changes you feel are needed before this SAR is ready to move forward to standard drafting.

Comments: There should be a provision for the ability to demonstrate backup functionality if arranged/contracted with another reliability entity, as long as that entity can demonstrate their backup capability to meet the requirements and measures.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
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NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
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Yes

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Yes

No

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Comments: ATC does not support the proposed exclusion for Transmission Operators. The exclusion allows an exempt Transmission Operator to determine post event how they should continue to monitor their transmission system. The result would be an unmonitored transmission system for possibly days or months.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
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NERC Region		Registered Ballot Body Segment
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Yes

No

Comments: It is clear that the standard would apply to the Transmission Operator. It is considerably less clear when it would apply to a transmission owner that is not also a transmission operator. I am not aware of a case where the Transmission Owner is operating a control center and performing functions that have impact on the reliability of the Bulk Power System, but such a situation could exist. In that situation, the transmission owner might be considered to be delegated such tasks by the transmission operator or some other functional entity. My concern is that there may be some shades of grey, where it is not clear whether or not a transmission owner is required to comply with the standard.

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Yes

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
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Organization:	ERCOT	
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NERC Region		Registered Ballot Body Segment
<input checked="" type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
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Yes

No

Comments: If the Transmission Owner is performing tasks in accordance with a delegation agreement between the Transmission Owner and the Transmission Operator, the Transmission Operator is still responsible for meeting the requirements of the function. The delegation agreement should cover and include the relevant requirements for backup functionality of the Transmission Owner. I believe the NERC standard should show applicability to the Transmission Operator.

2. The SAR drafting team has deleted COM-001 from the revised SAR based on the fact that COM-001 deals with generic communication issues and not backup facility issues. Communication support explicitly needed for backup facilities will be considered in the revision of EOP-008. Also, COM-001 is covered in other areas of the Reliability Standards Development Plan 2007–2009. On this basis, do you agree that COM-001 should be deleted from the scope of this SAR?

Yes

No

Comments:

3. Please highlight any other changes you feel are needed before this SAR is ready to move forward to standard drafting.

Comments: The SAR should clearly show that the backup requirements apply to the functionality rather than specifying how to do it. In other words, say they must be able to do "what" and not that they must have a backup facility (which is a "how"). This is not to say that I do not believe that backup facilities are important. They are important, and I believe it is prudent for the responsible entities to have them. However, the reliability requirement is that the responsible entity be able to perform under need.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Greg Lange	
Organization:	Grant County PUD (GCPD)	
Telephone:	509 754-5061	
E-mail:	glange@gcpud.org	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
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Yes

No

Comments: If a transmission owner operates a control center, they are a transmission operator. Therefore, the SAR doesn't need to address transmission owners. They just need to properly register their entity.

2. The SAR drafting team has deleted COM-001 from the revised SAR based on the fact that COM-001 deals with generic communication issues and not backup facility issues. Communication support explicitly needed for backup facilities will be considered in the revision of EOP-008. Also, COM-001 is covered in other areas of the Reliability Standards Development Plan 2007–2009. On this basis, do you agree that COM-001 should be deleted from the scope of this SAR?

Yes

No

Comments: EOP-008 only discusses loss of primary control facilities. No need to look at standards dealing with normal operations.

3. Please highlight any other changes you feel are needed before this SAR is ready to move forward to standard drafting.

Comments: Please change the name of the SAR from Backup Facilities to Loss of Primary Control Facilities. Revision of EOP-008 should not specify requirement for a backup control center. There are several other viable ways to maintain or resume control with a loss of primary facilities. Even if the drafters intent is correct, the title is confusing. If it is the intent of the drafters/sponsor to create a requirement for the existence of backup control centers, then a new SAR should be written that is not listed as a revision of an existing standard.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Roger Champagne	
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E-mail:	champagne.roger.2@hydro.qc.ca	
NERC Region		Registered Ballot Body Segment
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Yes

No

Comments: Although HQT see value, from a reliability perspective, to have "large" TOs with control centers, to have back-up facilities, it seems more appropriate to leave the details of what TO backup facilities are necessary in the individual TOP/TO operating agreements when a task is delegated. If a TO perform tasks that might impact the BPS, maybe they should register as a TOP.

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(Complete this page for comments from one organization or individual.)		
Name:	Ron Falsetti	
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NERC Region		Registered Ballot Body Segment
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- Clarified that the standard will apply to any entity for which the loss of its primary control capability would impose a significant real-time reliability risk to the Bulk Power System — and includes the Reliability Coordinator, Balancing Authority, Transmission Operator, and any entity (including the Transmission Owner) performing reliability functions as a result of delegation of tasks from those entities

Please review the revised SAR and then answer the questions in this comment form. Comments must be submitted by **March 16, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.com with the words “Backup Facilities” in the subject line.

You do not have to answer all questions.

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

1. The revised SAR shows the Transmission Owner as an applicable entity based on the concept that there are Transmission Owners that operate control centers that could potentially have impact on the reliability of the Bulk Power System. Do you agree that the standard drafting team needs to have the flexibility to address the issue of Transmission Owners as applicable entities in the drafting of the standard?

Yes

No

Comments: Even though we see value, from a reliability perspective, to have "large" TOs with control centers, to have back-up facilities, we are not comfortable with the idea of mandating this through a NERC standard. We strongly feel that the details of what TO backup facilities are necessary, should be dealt between the TOP and TO in their respective operating agreements.

2. The SAR drafting team has deleted COM-001 from the revised SAR based on the fact that COM-001 deals with generic communication issues and not backup facility issues. Communication support explicitly needed for backup facilities will be considered in the revision of EOP-008. Also, COM-001 is covered in other areas of the Reliability Standards Development Plan 2007–2009. On this basis, do you agree that COM-001 should be deleted from the scope of this SAR?

Yes

No

Comments:

3. Please highlight any other changes you feel are needed before this SAR is ready to move forward to standard drafting.

Comments:

Comment Form — Second Draft of SAR for Backup Facilities

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Kathleen Goodman	
Organization:	ISO New England	
Telephone:	(413) 535-4111	
E-mail:	kgoodman@iso-ne.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 or 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 or Regional Entities

Background Information

The revised SAR clarifies that this project revises EOP-008-0, Plans for Loss of Control Center Functionality, to emphasize the continuation of functionality needed by Reliability Coordinators, Balancing Authorities, and Transmission Operators for reliable system operation regardless of the manner in which it is achieved.

The definition of backup capability that is pertinent to this effort is: the ability to maintain situational awareness and continue to comply with reliability standards when primary control center facilities are not operational, including consideration for communications required to explicitly support backup facilities.

The drafting team made several changes to the SAR based on stakeholder comments, including the following:

- Clarified that the work of the Operating Committee Backup Control Center Task Force will be used as one of the inputs to the revision of EOP-008
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Yes

No

Comments: Per the NERC Functional Model, the Transmission Operator operates the control centers.

2. The SAR drafting team has deleted COM-001 from the revised SAR based on the fact that COM-001 deals with generic communication issues and not backup facility issues. Communication support explicitly needed for backup facilities will be considered in the revision of EOP-008. Also, COM-001 is covered in other areas of the Reliability Standards Development Plan 2007–2009. On this basis, do you agree that COM-001 should be deleted from the scope of this SAR?

Yes

No

Comments:

3. Please highlight any other changes you feel are needed before this SAR is ready to move forward to standard drafting.

Comments: There are other SARs that have been posted recently that includes reviews and potential changes to standards this SAR will impact. ISO New England believes that the Standards Committee should work to resolve multiple SARs covering the same standards to prevent confusion and potential loss of changes. It is important that these SARs are sequenced properly to ensure that there are not any lost changes.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Brian Thumm	
Organization:	ITC Transmission	
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 or ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
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1. The revised SAR shows the Transmission Owner as an applicable entity based on the concept that there are Transmission Owners that operate control centers that could potentially have impact on the reliability of the Bulk Power System. Do you agree that the standard drafting team needs to have the flexibility to address the issue of Transmission Owners as applicable entities in the drafting of the standard?

Yes

No

Comments: If a Transmission Owner operates a control center, then they are a Transmission Operator. They should register as such.

2. The SAR drafting team has deleted COM-001 from the revised SAR based on the fact that COM-001 deals with generic communication issues and not backup facility issues. Communication support explicitly needed for backup facilities will be considered in the revision of EOP-008. Also, COM-001 is covered in other areas of the Reliability Standards Development Plan 2007–2009. On this basis, do you agree that COM-001 should be deleted from the scope of this SAR?

Yes

No

Comments:

3. Please highlight any other changes you feel are needed before this SAR is ready to move forward to standard drafting.

Comments:

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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 or ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
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1. The revised SAR shows the Transmission Owner as an applicable entity based on the concept that there are Transmission Owners that operate control centers that could potentially have impact on the reliability of the Bulk Power System. Do you agree that the standard drafting team needs to have the flexibility to address the issue of Transmission Owners as applicable entities in the drafting of the standard?

Yes

No

Comments:

2. The SAR drafting team has deleted COM-001 from the revised SAR based on the fact that COM-001 deals with generic communication issues and not backup facility issues. Communication support explicitly needed for backup facilities will be considered in the revision of EOP-008. Also, COM-001 is covered in other areas of the Reliability Standards Development Plan 2007–2009. On this basis, do you agree that COM-001 should be deleted from the scope of this SAR?

Yes

No

Comments:

3. Please highlight any other changes you feel are needed before this SAR is ready to move forward to standard drafting.

Comments: No other comments.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Robert Coish	
Organization:	Manitoba Hydro	
Telephone:	204-487-5479	
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 or ISOs
<input checked="" type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
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1. The revised SAR shows the Transmission Owner as an applicable entity based on the concept that there are Transmission Owners that operate control centers that could potentially have impact on the reliability of the Bulk Power System. Do you agree that the standard drafting team needs to have the flexibility to address the issue of Transmission Owners as applicable entities in the drafting of the standard?

Yes

No

Comments: If the Transmission Owner operates a control centre then it should be registered as a Transmission Operator and meet the back up facility requirements.

2. The SAR drafting team has deleted COM-001 from the revised SAR based on the fact that COM-001 deals with generic communication issues and not backup facility issues. Communication support explicitly needed for backup facilities will be considered in the revision of EOP-008. Also, COM-001 is covered in other areas of the Reliability Standards Development Plan 2007–2009. On this basis, do you agree that COM-001 should be deleted from the scope of this SAR?

Yes

No

Comments:

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Individual Commenter Information		
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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 or ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
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1. The revised SAR shows the Transmission Owner as an applicable entity based on the concept that there are Transmission Owners that operate control centers that could potentially have impact on the reliability of the Bulk Power System. Do you agree that the standard drafting team needs to have the flexibility to address the issue of Transmission Owners as applicable entities in the drafting of the standard?

Yes

No

Comments: If Transmission Owner is operating a control center, this would make them a transmission operator and they should register as one.

2. The SAR drafting team has deleted COM-001 from the revised SAR based on the fact that COM-001 deals with generic communication issues and not backup facility issues. Communication support explicitly needed for backup facilities will be considered in the revision of EOP-008. Also, COM-001 is covered in other areas of the Reliability Standards Development Plan 2007–2009. On this basis, do you agree that COM-001 should be deleted from the scope of this SAR?

Yes

No

Comments: Since this SAR is dealing directly with backup capabilities, removing consideration of COM-001 makes sense. However, this causes a fundamental question. Should the standards defining primary control center capabilities include the back up capabilities as well? If so, a supplemental SAR will be required and then COM-001 would need to be considered.

3. Please highlight any other changes you feel are needed before this SAR is ready to move forward to standard drafting.

Comments: There are other SARs that have been posted recently that includes reviews and potential changes to standards this SAR will impact. For example, the Reliability Coordination (Project 2006-06) SAR will include modifications to IRO-002. This SAR should address how these changes will be coordinated with the Reliability Coordination SAR, other existing SARs and any other SAR that is expected to be proposed from the NERC Reliability Standards Work Plan.

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(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		Registered Ballot Body Segment
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Comment Form — Second Draft of SAR for Backup Facilities

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

Group Name: NSRS
Lead Contact: Carol Gerou
Contact Organization: MRO
Contact Segment: 10
Contact Telephone: 218-722-1972 ext. 2058
Contact E-mail: cgerou@mnpower.com

Additional Member Name	Additional Member Organization	Region*	Segment*
Neal Balu	WPSR	MRO	10
Terry Bilke	MISO	MRO	10
Al Boesch	NPPD	MRO	10
Larry Brusseau	MRO	MRO	10
Robert Coish, Chair	MHEB	MRO	10
Carol Gerou	MP	MRO	10
Ken Goldsmith	ALT	MRO	10
Todd Gosnell	OPPD	MRO	10
Jim Haigh	WAPA	MRO	10
Pam Oreschnik	XCEL	MRO	10
Dick Pursley	GRE	MRO	10
Dave Rudolph	BEPC	MRO	10
Rick Liljegren	MP	MRO	10
Michael Brytowsk, Secretary	MRO	MRO	10
27 Additional MRO Members	Not Named Above	MRO	10

*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

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

1. The revised SAR shows the Transmission Owner as an applicable entity based on the concept that there are Transmission Owners that operate control centers that could potentially have impact on the reliability of the Bulk Power System. Do you agree that the standard drafting team needs to have the flexibility to address the issue of Transmission Owners as applicable entities in the drafting of the standard?

Yes

No

Comments: These facilities are critical to the reliable operation of the Bulk Power system therefore flexibility to include a transmission owner as an applicable entity is reasonable.

2. The SAR drafting team has deleted COM-001 from the revised SAR based on the fact that COM-001 deals with generic communication issues and not backup facility issues. Communication support explicitly needed for backup facilities will be considered in the revision of EOP-008. Also, COM-001 is covered in other areas of the Reliability Standards Development Plan 2007–2009. On this basis, do you agree that COM-001 should be deleted from the scope of this SAR?

Yes

No

Comments:

3. Please highlight any other changes you feel are needed before this SAR is ready to move forward to standard drafting.

Comments: 1. Remove mitigation time horizons from the SAR because they are not defined and they are not part of the Standards Development Procedure.

2. Need to specify which standards are included in this SAR to be modified other than standard IRO-002.

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Name:		
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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 or 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 or Regional Entities

Comment Form — Second Draft of SAR for Backup Facilities

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
Herb Schrayshuen	National Grid US	NPCC	1
Murale Gopinathan	Northeast Utilities	NPCC	1
Jerad Barnhart	NStar	NPCC	1
Roger Champagne	TransEnergie HydroQuebec	NPCC	1
Kathleen Goodman	ISO-New England	NPCC	2
Bill Sehemley	ISO-New England	NPCC	2
Ron Falsetti	The IESO	NPCC	2
Randy McDonald	New Brunswick System Operator	NPCC	2
Al Adamson	New York St. Reliability Council	NPCC	10
Greg Campoli	New York ISO	NPCC	2
Guy Zito	NPCC	NPCC	10
Don Nelson	MA Dept. of Tele. and Energy	NPCC	9

*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

The revised SAR clarifies that this project revises EOP-008-0, Plans for Loss of Control Center Functionality, to emphasize the continuation of functionality needed by Reliability Coordinators, Balancing Authorities, and Transmission Operators for reliable system operation regardless of the manner in which it is achieved.

The definition of backup capability that is pertinent to this effort is: the ability to maintain situational awareness and continue to comply with reliability standards when primary control center facilities are not operational, including consideration for communications required to explicitly support backup facilities.

The drafting team made several changes to the SAR based on stakeholder comments, including the following:

- Clarified that the work of the Operating Committee Backup Control Center Task Force will be used as one of the inputs to the revision of EOP-008
- Removed COM-001 from the list of standards included in the scope of this project
- Modified the SAR to clarify that there “may” be some requirements for backup capabilities in other reliability standards and added IRO-002 to the list of related standards because it does contain a backup facility requirement
- Clarified that Appendix B is an informative attachment that contains material for consideration in the standards revision process, but should not be considered to contain mandatory changes to the standard
- Clarified that the standard will apply to any entity for which the loss of its primary control capability would impose a significant real-time reliability risk to the Bulk Power System — and includes the Reliability Coordinator, Balancing Authority, Transmission Operator, and any entity (including the Transmission Owner) performing reliability functions as a result of delegation of tasks from those entities

Please review the revised SAR and then answer the questions in this comment form. Comments must be submitted by **March 16, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.com with the words “Backup Facilities” in the subject line.

You do not have to answer all questions.

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

1. The revised SAR shows the Transmission Owner as an applicable entity based on the concept that there are Transmission Owners that operate control centers that could potentially have impact on the reliability of the Bulk Power System. Do you agree that the standard drafting team needs to have the flexibility to address the issue of Transmission Owners as applicable entities in the drafting of the standard?

Yes

No

Comments: Although NPCC participating members see value, from a reliability perspective, to have "large" TOs with control centers, to have back-up facilities, there is trepidation with the idea of mandating this through a NERC standard. It is more appropriate to leave the details of what TO backup facilities are necessary in the individual TOP/TO operating agreements.

2. The SAR drafting team has deleted COM-001 from the revised SAR based on the fact that COM-001 deals with generic communication issues and not backup facility issues. Communication support explicitly needed for backup facilities will be considered in the revision of EOP-008. Also, COM-001 is covered in other areas of the Reliability Standards Development Plan 2007–2009. On this basis, do you agree that COM-001 should be deleted from the scope of this SAR?

Yes

No

Comments:

3. Please highlight any other changes you feel are needed before this SAR is ready to move forward to standard drafting.

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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:	gcampoli@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 or ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
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Yes

No

Comments: Per the NERC Functional Model, the Transmission Operator operates the control centers and should have sole responsibility for BPS Operation. The TOP has responsibility to ensure others who are supporting their control center, such as a TO, can do so as defined in agreements or reliability plans. A transmission owner with a control center that takes independent action on the BPS should be register as a TOP.

2. The SAR drafting team has deleted COM-001 from the revised SAR based on the fact that COM-001 deals with generic communication issues and not backup facility issues. Communication support explicitly needed for backup facilities will be considered in the revision of EOP-008. Also, COM-001 is covered in other areas of the Reliability Standards Development Plan 2007–2009. On this basis, do you agree that COM-001 should be deleted from the scope of this SAR?

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Comments:

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Wayne Lewis	
Organization:	Progress Energy	
Telephone:	919-546-7936	
E-mail:	wayne.lewis@pgnmail.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
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(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
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NERC Region		Registered Ballot Body Segment
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Yes

No

Comments: Per the NERC Functional Model, the Transmission Operator operates the control centers.

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