

Consideration of Comments on 2nd Posting of Backup Facilities SAR

The Backup Facilities SAR requesters thank all commenters who submitted comments on Draft 2 of the Backup Facilities SAR. This SAR was posted for a 30-day public comment period from February 8 through March 9, 2007. The requesters asked stakeholders to provide feedback on the standard through a special standard Comment Form. There were 7 sets of comments, including comments from 48 different people from 44 companies and organizations 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 SC approve the SAR and move this project on to the standards drafting stage.

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 standards can be viewed in their original format at:

http://www.nerc.com/~filez/standards/Backup_Facilities.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 Director of Standards, Gerry Adamski, at 609-452-8060 or at gerry.adamski@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

No changes were made to the SAR as a result of the comments received. While there were some comments received concerning the inclusion of specific applicable entities in the SAR, the SAR DT has responded to those comments. However, there is a minority opinion within the SAR DT concerning the applicability of the SAR and eventual standard to the TO. The SAR DT wanted to maintain for the future SDT the possibility of including the TO as an applicable entity to address the problem that may arise when a TOP delegates critical tasks to the TO. The SAR DT sees this as a larger problem that needs to be addressed in the respective Delegation Agreements, NERC Functional Model and/or the NERC entity registration process.

The drafting team did modify the SAR to replace the items listed under the FERC NOPR with the items now listed in FERC Order 693 and to remove references to 'Phase III & IV' standards.

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

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The Industry Segments are:

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

Commenter		Organization	Industry Segment											
			1	2	3	4	5	6	7	8	9	10		
1.	Wayne Lewis	Progress Energy	✓		✓		✓	✓						
2.	Melinda Montgomery	Entergy Services, Inc.	✓											
3.	Greg Lange	Grant County PUD			✓									
4.	Roger Champagne	Hydro-Québec TransÉnergie	✓											
5.	Kathleen Goodman	ISO New England		✓										
6.	Brian Thumm	ITC Transmission	✓											
7.	Ralph Rufrano (G1)	NYPA	✓											
8.	Herb Schrayshuen (G1)	NGrid	✓											
9.	Murale Gopinathan (G1)	NU	✓											
10.	Jerad Barnhart (G1)	NStar	✓											
11.	Roger Champagne (G1)	TransÉnergie Hydro-Québec	✓											
12.	Kathleen Goodman (G1)	ISO New England		✓										
13.	Bill Shemley (G1)	ISO New England		✓										
14.	Ron Falsetti (I)	IESO		✓										
15.	Randy MdDonald (G1)	NBSO		✓										
16.	Al Adamson (G1)	NYSRC		✓										
17.	Greg Campoli (G1)	NYISO		✓										
18.	Guy Zito (G1)	NPCC												✓
19.	Don Nelson (G1)	MA Dept. of Tele. And Energy											✓	
20.	James H. Sorrels, Jr	AEP	✓					✓	✓					
21.	Jason Shaver	ATC	✓											
22.	Steven Myers	ERCOT		✓										
23.	Michael Gammon	KCP&L	✓											
24.	Robert Coish	Manitoba Hydro	✓					✓	✓					
25.	Jason Marshall (G2)	MISO		✓										
26.	Jim Cyrulewski (G2)	JDRJC Associations										✓		
27.	Carol Gerou (G3)	MRO												✓
28.	Neal Balu (G3)	WPSR												✓

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	Commenter	Organization	Industry Segment										
			1	2	3	4	5	6	7	8	9	10	
29.	Terry Bilke (G3)	MISO											✓
30.	Al Boesch (G3)	NPPD											✓
31.	Larry Brusseau (G3)	MRO											✓
32.	Robert Coish, Chair (G3)	MHEB											✓
33.	Ken Goldsmith (G3)	ALT											✓
34.	Todd Gosnell (G3)	OPPD											✓
35.	Jim Haigh (G3)	WAPA											✓
36.	Pam Oreschnik (G3)	XCEL											✓
37.	Dick Pursley (G3)	GRE											✓
38.	Dave Rudolph (G3)	BEPC											✓
39.	Rick Liljegren (G3)	MP											✓
40.	Michael Brytowski, Secretary (G3)	MRO											✓
41.	Charles Yeung (G4)	SRC		✓									
42.	Alicia Daugherty (G4)	PJM		✓									
43.	Mike Calimano (G4)	NYISO		✓									
44.	Ron Falsetti (G4)	IESO		✓									
45.	Matt Goldberg (G4)	ISO-NE		✓									
46.	Brent Kingsford (G4)	CAISO		✓									
47.	Anita Lee (G4)	AESO		✓									
48.	Steve Myers (G4)	ERCOT		✓									
49.	Bill Phillips (G4)	MISO		✓									
50.	Jack Kerr	Dominion Virginia Power	✓										
51.	Michael Calimano	NYISO		✓									
52.	Ron Falsetti	IESO		✓									
53.	George Carruba	East Kentucky Power Cooperative	✓										

I – Indicates that individual comments were submitted in addition to comments submitted as part of a group

G1 – NPCC CP9 Reliability Standards Working Group (NPCC CP9)

G2 – MRO and JDRJC Associates

G3 – MRO Members

G4 – Standards Review Committee

Index to Questions, Comments, and Responses

- 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..... 5
- 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? 8
- 3. Please highlight any other changes you feel are needed before this SAR is ready to move forward to standard drafting.10

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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

Summary Consideration: The only negative comments received to this question were as to the inclusion of the Transmission Owner as an applicable entity. The SAR DT believes that this needs to be left to the auspices of the eventual SDT to allow them the maximum flexibility to do their job correctly. If the Transmission Owner is included by the SDT, the industry will receive their opportunity to express their opinion during the standards drafting and balloting processes. The SAR DT believes that we have responded to all of the comments.

Question #1			
Commenter	Yes	No	Comment
NPCC CP9		<input checked="" type="checkbox"/>	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.
Hydro-Québec TransÉnergie		<input checked="" type="checkbox"/>	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.
IESO		<input checked="" type="checkbox"/>	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.
ISO-NE		<input checked="" type="checkbox"/>	Per the NERC Functional Model, the Transmission Operator operates the control centers.
Grant County PUD		<input checked="" type="checkbox"/>	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.
ITC Transmission		<input checked="" type="checkbox"/>	If a Transmission Owner operates a control center, then they are a Transmission Operator. They should register as such.
Entergy		<input checked="" type="checkbox"/>	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

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Question #1			
Commenter	Yes	No	Comment
			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 gray, where it is not clear whether or not a transmission owner is required to comply with the standard.
MISO (G2)		<input checked="" type="checkbox"/>	If Transmission Owner is operating a control center, this would make them a transmission operator and they should register as one.
SRC (G4)		<input checked="" type="checkbox"/>	Per the NERC Functional Model, the Transmission Operator operates the control centers.
East Kentucky Power Cooperative		<input checked="" type="checkbox"/>	TOs performing TOP functions should register as TOPs and would then be appropriately covered by this standard.
NYISO		<input checked="" type="checkbox"/>	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.
Manitoba Hydro	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	If the Transmission Owner operates a control centre then it should be registered as a Transmission Operator and meet the back up facility requirements.
ERCOT	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	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.
Dominion Virginia Power	<input checked="" type="checkbox"/>		TOs (or other entities) to whom reliability tasks have been delegated should be required to have the backup facilities necessary to provide backup capabilities for those delegated tasks. Also, consideration should be given to expanding the scope to include "shared" tasks that some TOs (or other entities) are required to perform by their TOP or RC as part of a "defense in depth" strategy for monitoring and reliability analysis (for example, state estimation and contingency analysis performed by a TO at a local level to complement the "wide area" state estimation and contingency analysis performed by the RC). Also, an argument could be made that TOs (or other entities) who perform delegated or shared reliability tasks but that do not have backup facilities can be a burden on their neighbors upon loss of the capability to perform these tasks. This is because overall reliability suffers (risk goes up) when these delegated or shared tasks

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Question #1			
Commenter	Yes	No	Comment
			are not being performed. This is especially true for TOs who supply real-time reliability data to their RC and other TOs or TOPs when loss of primary facilities causes large amounts of data to cease to be available to the data recipients. Such a loss of data exchange capability is a common cause of state estimator solution problems for data recipients.
<p>Response: The SAR DT considered the comments above, and concluded that the SDT should have the flexibility to consider Transmission Owners, under certain circumstances where a Transmission Owner operates a control facility, as applicable entities for this standard. The comments suggest other alternatives that the SDT may also choose to consider in drafting the standard. Some of the comments suggest that if all Transmission Owners that operate control centers register as Transmission Operators then the suggested flexibility would not be necessary. The SAR DT agrees with that, but also recognizes that in the current situation the underpinning assumption that all entities operating control centers are registered that way isn't factual. Other comments suggest that this requirement can be adequately covered in delegation agreements between the Transmission Owner and Transmission Operator. The SAR DT recognizes that that may be an adequate approach, but believes the SDT should have the ability to consider whether that is an adequate approach or whether the importance of having backup capabilities warrants having an applicable standard apply directly rather than indirectly through delegation agreements. If the SDT leaves the Transmission Owner and/or Transmission Operator in the standard as applicable entities, the industry will receive their opportunity to express their opinion during the standards drafting and balloting processes.</p>			
MRO (G3)	<input checked="" type="checkbox"/>		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.
Progress Energy	<input checked="" type="checkbox"/>		
AEP	<input checked="" type="checkbox"/>		
ATC	<input checked="" type="checkbox"/>		
KCP&L	<input checked="" type="checkbox"/>		

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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?

Summary Consideration: There were no negative comments received for this question.

Question #2			
Commenter	Yes	No	Comment
MISO (G2)	<input checked="" type="checkbox"/>		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.
Response: The SAR DT considered how the backup facility requirements would be most clearly defined and came to the conclusion that a standalone document would be best and from the recent FERC issuance of Order 693, it appears that FERC concurs. Therefore, the SAR DT does not see the need for a supplemental SAR.			
Grant County PUD	<input checked="" type="checkbox"/>		EOP-008 only discusses loss of primary control facilities. No need to look at standards dealing with normal operations.
ITC Transmission	<input checked="" type="checkbox"/>		
Entergy	<input checked="" type="checkbox"/>		
Progress Energy	<input checked="" type="checkbox"/>		
AEP	<input checked="" type="checkbox"/>		
ATC	<input checked="" type="checkbox"/>		
ERCOT	<input checked="" type="checkbox"/>		
KCP&L	<input checked="" type="checkbox"/>		
Manitoba Hydro	<input checked="" type="checkbox"/>		
NPCC CP9	<input checked="" type="checkbox"/>		
Hydro-Québec TransÉnergie	<input checked="" type="checkbox"/>		
IESO	<input checked="" type="checkbox"/>		

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Question #2			
Commenter	Yes	No	Comment
ISO-NE	<input checked="" type="checkbox"/>		
MRO (G3)	<input checked="" type="checkbox"/>		
SRC (G4)	<input checked="" type="checkbox"/>		
Dominion Virginia Power	<input checked="" type="checkbox"/>		
NYISO	<input checked="" type="checkbox"/>		
East Kentucky Power Cooperative	<input checked="" type="checkbox"/>		

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

Summary Consideration: The only comments requiring a response for this question refer to matters beyond the scope of the SAR DT or that have been responded to in this document.

Question #3			
Commenter	Yes	No	Comment
ISO-NE			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.
Response: This issue is beyond the scope of the SAR DT. It is up to the SC and NERC staff to coordinate these types of issues.			
MISO (G2)			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.
Response: This issue is beyond the scope of the SAR DT. It is up to the SC and NERC staff to coordinate these types of issues.			
NYISO			There are other SARs that have been posted recently that includes reviews and potential changes to standards this SAR will impact. The IRC 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.
Response: This issue is beyond the scope of the SAR DT. It is up to the SC and NERC staff to coordinate these types of issues.			
SRC (G4)			There are other SARs that have been posted recently that includes reviews and potential changes to standards this SAR will impact. The IRC 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.
Response: This issue is beyond the scope of the SAR DT. It is up to the SC and NERC staff to coordinate these types of issues.			

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Question #3			
Commenter	Yes	No	Comment
Grant County PUD			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.
Response: The name of the present standard is "Plan for Loss of Control Center Functionality". While the SAR DT agrees with this position, it is not within the scope of the SAR DT to change the name of a SAR once it has been submitted. The actual name given to the revised standard will be addressed by the SDT.			
AEP			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.
Response: This issue is beyond the scope of the SAR DT. Your comment will be passed along to the SDT.			
ATC			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.
Response: The SAR DT made this exclusion so that very small operators who would not have an impact on the Bulk Power System would not be an applicable entity. The SDT will make the final determination on this matter.			
ERCOT			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.
Response: Please see the last sentence of the second paragraph of the Brief Description section of the SAR where this is specifically addressed.			
MRO (G3)			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.
Response: 1. The mitigation time horizon is a parameter of the reliability standard review guidelines that will be considered by the SDT. 2. The SAR DT has looked at the overall set of standards and feels that only IRO-002, R8 may have relevance to EOP-008.			

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Question #3			
Commenter	Yes	No	Comment
NPCC CP9			None.
Hydro-Québec TransÉnergie			None.
IESO			None.
KCP&L			None.
Manitoba Hydro			None.
ITC Transmission			None.
Entergy			None.
Progress Energy			None.
Dominion Virginia Power			None.
East Kentucky Power Cooperative			None.