

## Consideration of Comments on 2nd Draft of EOP-008-1 — Backup Facilities (Project 2006-04)

The Backup Facilities Standards Drafting Team thanks all commenters who submitted comments on the 2<sup>nd</sup> draft of reliability standard EOP-008-1 — Loss of Control Center Functionality. The proposed standard was posted for a 45-day public comment period from August 26, 2008 through October 9, 2008. The stakeholders were asked to provide feedback on the proposed metrics through a special electronic Standard Comment Form. There were more than 38 sets of comments, including comments from more than 95 different people from approximately 50 companies representing 8 of the 10 Industry Segments as shown in the table on the following pages.

[http://www.nerc.com/filez/standards/Backup\\_Facilities.html](http://www.nerc.com/filez/standards/Backup_Facilities.html)

Due to the large number of comments received, the SDT is recommending a third posting for this project.

Based on industry comments, the applicability exclusion for certain Transmission Operators has been deleted (Section 4.1.2) and the following requirements have been changed due to industry comments: R1, R1.2, R1.5, R1.6, R1.6.2, R2, R3, R4, R4.1, R4.2, R5, R5.1, R5.2, R6.1, R7, R8.1, and R8.3. In addition, the following measures were changed due to industry comments: M1, M2, M3, M4, M5, M6, M7, and M8. Also, VSL for the following requirements were changed based on comments: R1, R2, R3, R4, R5, R6, R7, and R8.

The SDT has also changed the entity cited in Requirement R9 from 'Regional Entity' to 'Reliability Assurer' in line with version 4 of the Functional Model.

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>.

**Index to Questions, Comments, and Responses**

1. The SDT has made a change in the applicability of the Transmission Operator (see Section 4.1.2). Do you agree with the change that was made? If not, please provide specific suggestions for improvement. .... 11

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**Consideration of Comments on 2<sup>nd</sup> Draft of EOP-008-1 — Backup Facilities (Project 2006-04)**

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.	Thad Ness	AEP	x		x		x	x						
2.	Jeff Hackman	Ameren	x		x		x	x						
3.	Denise Koehn	Bonneville Power Administration	x		x		x	x						
<b>Additional Member</b>		<b>Additional Organization</b>	<b>Region</b>	<b>Segment Selection</b>										
1.	James Burns	Transmission Technical Operations	WECC	1										
4.	David Carpenter	Brazos Electric Power Cooperative, Inc.		x		x		x						
5.	H. Deon Murphy	Bureau of Reclamation						x						

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Commenter		Organization	Industry Segment											
			1	2	3	4	5	6	7	8	9	10		
6.	Paul Rocha	CenterPoint Energy	x											
7.	Dan Brotzman	ComEd / Exelon	x		x									
8.	Jianmei Chai	Consumers Energy Company			x	x	x							
9.	Greg Rowland	Duke Energy	x		x		x	x						
10.	Greg Mason	Dynegy					x							
11.	Vann Weldon	Electric Reliability Council of Texas, Inc.		x										x
12.	Edward J Davis	Entergy Services, Inc	x											
13.	Will Franklin (Entergy)	Entergy System Planning & Operations (Generation & Marketing)							x					
<b>Additional Member</b>		<b>Additional Organization</b>	<b>Region</b>	<b>Segment Selection</b>										
1.	Joel Plessinger	Entergy SPO	SERC	6										
2.	Terri Benoit	Entergy SPO	SERC	6										
3.	Margaret Hebert	Entergy SPO	SERC	6										
4.	George Raesis	Entergy SPO	SERC	6										
14.	Doug Hohlbaugh	FirstEnergy Corp.		x		x	x	x	x					
<b>Additional Member</b>		<b>Additional Organization</b>	<b>Region</b>	<b>Segment</b>										

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Commenter		Organization		Industry Segment													
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<b>Selection</b>																	
1.	Doug Hohlbaugh	FirstEnergy Corp	RFC	1, 3, 4, 5, 6													
2.	David Folk	FirstEnergy Corp	RFC	1, 3, 4, 5, 6													
3.	Sam Ciccone	FirstEnergy Corp	RFC	1, 3, 4, 5, 6													
4.	John Martinez	FirstEnergy Corp	RFC	1, 3, 4, 5, 6													
15.	Roger Champagne	Hydro-Québec TransÉnergie (HQT)			x												
16.	Dan Rochester	Independent Electricity System Operator				x											
17.	Kathleen Goodman	ISO New England Inc				x											
18.	Charles Yeung (SPP)	ISO/RTO Council Standards Review Committee				x											
<b>Additional Member Additional Organization Region Segment Selection</b>																	
1.	Anita Lee	Alberta Electric System Operator	WECC	2													
2.	Lourdes Estrada-Salinero	California ISO	WECC	2													
3.	H. Steven Myers	ERCOT	ERCOT	2													
4.	Ben Li	IESO	NPCC	2													
5.	Matt Goldberg	ISO New England	NPCC	2													

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6.	Bill Phillips	Midwest ISO	RFC	2																																			
7.	Jim Castle	New York ISO	NPCC	2																																			
19.	Debra Yinger	ITC			x																																		
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2.	Michael Ayotte		RFC	1																																			
20.	Kris Manchur	Manitoba Hydro			x		x		x	x																													
21.	Jason Marshall	Midwest ISO				x																																	
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2.	Joe Knight	Great River Energy	MRO	1, 3, 5																																			
3.	Jim Cyrulewski, P.E.	JDRJC Associates	RFC	8																																			
22.	Joe DePoorter (MGE)	MRO NERC Standards Review Subcommittee					x	x	x	x																													
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2.	Terry Bilke	MISO	MRO	2																										
3.	Carol Gerou	MP	MRO	1, 3, 5, 6																										
4.	Jim Haigh	WAPA	MRO	1, 6																										
5.	Charles Lawrence	ATC	MRO	1																										
6.	Ken Goldsmith	ALTW	MRO	4																										
7.	Tom Mielnik	MEC	MRO	1, 3, 5, 6																										
8.	Pam Sordet	XCEL	MRO	1, 3, 5, 6																										
9.	Dave Rudolph	BEPC	MRO	1, 3, 5, 6																										
10.	Eric Ruskamp	BEPC	MRO	1, 3, 5, 6																										
11.	Joseph Knight	GRE	MRO	1, 3, 5, 6																										
12.	LARRY Brusseau	MRO	MRO	10																										
13.	Michael Brytowski	MRO	MRO	10																										
23.	Rick White				Northeast Utilities	x																								
24.	Guy Zito				NPCC															x										
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2.	Roger Champagne	Hydro-Quebec TransEnergie	NPCC	2															
3.	Rick White	Northeast Utilities	NPCC	1															
4.	Greg Campoli	New York Independent System Operator	NPCC	2															
5.	Kathleen Goodman	ISO - New England	NPCC	2															
6.	Chris De Graffenried	Consolidated Edison Co. of New York, Inc.	NPCC	1															
7.	Don Nelson	Massachusetts Dept. of Public Utilities	NPCC	9															
8.	Brian Evans-Mongeon	Utility Services	NPCC	6															
9.	Mike Gildea	Constellation Energy	NPCC	6															
10.	Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1															
11.	Dan Rochester	Independent Electricity System Operator	NPCC	2															
12.	Brian Gooder	Ontario Power Generation Incorporated	NPCC	5															
13.	Lee Pedowicz	NPCC	NPCC	NA															
14.	Gerry Dunbar	NPCC	NPCC	NA															
15.	Brian Hogue	NPCC	NPCC	NA															
25.	Greg Ward / Darryl Curtis	Oncor Electric Delivery			x														
26.	Richard Kafka	Pepco Holdings, Inc. - Affiliates			x														

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1.	Dave Thorne	Potomac Electric Power Co	RFC	1																
2.	Vic Davis	Delmarva Power & Light Co	RFC	1																
27.	Tom Moleski	PJM Interconnection				x														
28.	D. Bryan Guy	Progress Energy Carolinas, Inc.			x		x		x											
29.	Marty Berland	Progress Energy-Florida			x		x		x	x										
30.	Todd Lietz	Puget Sound Energy			x		x													
31.	Rao Somayajula	ReliabilityFirst Corporation																		x
32.	Randy Schimka	San Diego Gas and Electric			x		x	x	x											
33.	Terry L. Blackwell	Santee Cooper			x															
<b>Additional Member</b>	<b>Additional Organization</b>	<b>Region</b>	<b>Segment Selection</b>																	
1.	S. T. Abrams	Santee Cooper	SERC	1																
2.	Glenn Stephens	Santee Cooper	SERC	1																
3.	Wayne Ahl	Santee Cooper	SERC	1																
4.	Jim Peterson	Santee Cooper	SERC	1																

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5.	Rene' Free	Santee Cooper	SERC	1																																																			
34.	Richard Salgo	Sierra Pacific Power Co. (dba NV Energy)		x																																																			
35.	Roman Carter	Southern Company Transmission		x																																																			
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36.	Linda Perez (WECC)	WECC Reliability Coordinator Comment Working Group																		x																																			
37.	Robert Temple	Western Area Power Administration		x																																																			
38.	Alice Druffel	Xcel Energy		x		x		x	x																																														

1. The SDT has made a change in the applicability of the Transmission Operator (see Section 4.1.2). Do you agree with the change that was made? If not, please provide specific suggestions for improvement.

**Summary Consideration:**

Many commenters expressed disapproval of the applicability exclusion proposed for certain Transmission Operators. Based on these comments and further research by the SDT, it appears that the exclusion is not necessary as the intent of the SDT is covered in the NERC “Statement of Compliance Registry Criteria (Revision 5.0)” and Section 501 (specifically Section 501 1.2.3) of the NERC Rules of Procedure which addresses the entities who should be registered as a TOP, and therefore, subject to the applicable provisions of this standard. Therefore, the exclusionary language of Section 4.1.2 has been deleted.

~~4.1.2. Transmission Operator operating Facilities at 200 kV or above, or non-radial Facilities above 100 kV, or Facilities demonstrated by the Regional Entity to be critical to the reliability of the Bulk Electric System (BES).~~

Organization	Question 1:	Question 1 Comments:
Manitoba Hydro	No	I suggest the applicability for the Transmission Operator be changed to the following: "Transmission Operator operating Bulk Electric System (BES) Facilities at 100 kV or higher, including those Facilities demonstrated by the Regional Entity to be critical to the reliability of the Bulk Electric System." The Transmission Operator that just has a radial connection to the BES is taken care of by the definition of Bulk Electric System which states: "Radial transmission facilities serving only load with one transmission source are generally not included in this definition."
Sierra Pacific Power Co. (dba NV Energy)	No	We would recommend the deletion of the last portion of the applicability statement in 4.1.2. The suggestion is to delete "or Facilities demonstrated by the Regional Entity to be critical to the reliability of the Bulk Electric System (BES)". We believe this part of the applicability is highly subjective and would result in uncertainty among entities who are excluded today, but could suddenly be subject to this Standard due to a subjective judgment call made by their Regional Entity at some point in the future. The Regional Entities presently do not exhibit consistency in their determination of the components of the BES, and quite likely would be even less consistent in a determination of facilities "critical to the reliability of the BES". The applicability statement that would remain after this suggested deletion would not only be clear and objective, it would also point to the specific entities that should be responsible for complying with this Standard.
<p><b>Response:</b> Based on your comment and many others, the SDT has decided to remove all qualifying language from 4.1.2 and list only</p>		

Consideration of Comments on 2<sup>nd</sup> Draft of EOP-008-1 — Backup Facilities (Project 2006-04)

Organization	Question 1:	Question 1 Comments:
<p>“Transmission Operator.” We believe, and in addition are convinced by comments received, that the NERC “Statement of Compliance Registry Criteria (Revision 5.0)” and Section 501 (specifically Section 501 1.2.3) of the NERC Rules of Procedure satisfactorily addresses which entities should be registered as a TOP, and therefore, subject to the applicable provisions of this standard. The standards drafting process is not the appropriate venue for addressing inconsistency issues regarding the Regional Entities. This should be addressed directly with the Regional Entities, or if necessary, with NERC or FERC.</p> <p><del>4.1.2 Transmission Operator operating Facilities at 200 kV or above, or non-radial Facilities above 100 kV, or Facilities demonstrated by the Regional Entity to be critical to the reliability of the Bulk Electric System (BES).</del></p>		
NPCC	No	The addition of the wording "operating Facilities at 200 kV or above, or non-radial Facilities above 100 kV," is not appropriate.
Hydro-Québec TransÉnergie (HQT)	No	The addition of the wording "operating Facilities at 200 kV or above, or non-radial Facilities above 100 kV," is not appropriate and should be removed.
Northeast Utilities	No	The addition of the language, "operating Facilities at 200 kV or above, or non radial Facilities above 100 kV", is not appropriate.
Entergy Services, Inc	No	We suggest the Applicability to Transmission Operators (4.1.2) be revised as follows to improve readability, to address the ambiguity of the use of the word "critical", and to address section c of the Applicability statement. Use of the term "critical" is vague and causes confusion as evidenced in the Vegetation standards, Cyber standards, and others. We suggest not using "critical" and revising the Applicability to address what is desired - requiring backup functionality for operators of "transmission facilities that have a material impact on the reliability of the BES." We suggest the following Applicability for Transmission Operator: 4.1.2. Transmission Operator operating: a) Transmission Facilities at 200 kV or above, or b) non-radial Transmission Facilities above 100 kV, or c) Transmission Facilities operating at voltages lower than those identified in a) or b) that are demonstrated to have a material impact on the reliability of the Bulk Electric System (BES)
ITC	No	The addition to 4.1.2 attempts to address what is really a registration and BES definition issue. This is not the proper place to these issues. The applicability should be just to the TOP and any limitation to the scope of the TOP should be handled in registration.

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Organization	Question 1:	Question 1 Comments:
ISO New England Inc	No	We agree with the drafting team's intent to eliminate the burden on a Transmission Operator that just has a radial connection to the BES under 200 kV by limiting TOP applicability. However, this is a registration issue and really identifies an issue with the definition of the BES. A standard is not the proper place to address registration and BES definition issues. The applicability should be just to the TOP and any limitation should be handled in registration. TOPs operating only radial transmission lines serving load are already excluded from registering per Section 501 sub-section 1.2.3 of the NERC Rules of Procedure. Limiting applicability further than this on radial transmission lines in essence redefines the BES and that is not a function of a standard. Please remove the language limiting the applicability.
Ameren	No	We agree with the drafting team's intent to eliminate the burden on a Transmission Operator that just has a radial connection to the BES under 200 kV by limiting TOP applicability. However, this is a registration issue and really identifies an issue with the definition of the BES. A standard is not the proper place to address registration and BES definition issues. The applicability should be just to the TOP and any limitation should be handled in registration. TOPs operating only radial transmission lines serving load are already excluded from registering per Section 501 sub-section 1.2.3 of the NERC Rules of Procedure. Limiting applicability further than this on radial transmission lines in essence redefines the BES and that is not a function of a standard. Please remove the language limiting the applicability.
ISO/RTO Council	No	We agree with the drafting team's intent to eliminate the burden on a Transmission Operator that just has a radial connection to the BES under 200 kV by limiting TOP applicability. However, this is a registration issue and really identifies an issue with the definition of the BES. A standard is not the proper place to address registration and BES definition issues. The applicability should be just to the TOP and any limitation should be handled in registration. TOPs operating only radial transmission lines serving load are already excluded from registering per Section 501 sub-section 1.2.3 of the NERC Rules of Procedure. Limiting applicability further than this on radial transmission lines in essence redefines the BES and that is not a function of a standard. Please remove the language limiting the applicability.
FirstEnergy Corp.	No	We understand and appreciate the drafting team's intent to eliminate the burden on a Transmission Operator with one radial connection under 200 kV to the BES by refining the applicability to exclude such entities. However, what if there was a single radial 200kV+ line to load not owned by the traditional TO/TOP in the area? Would the owner of the facility be required to have a primary/back-up control center? The applicability section of this standard is not the appropriate place to address these issues. The exclusion for TOPs operating only radial transmission lines serving load is contained in Section 501 sub-section 1.2.3 of the NERC Rules of Procedure. Exclusion issues should be vetted and managed in the Rules of Procedure

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Organization	Question 1:	Question 1 Comments:
		and the registration processes. The applicability of this standard should point to the functional model entities used in the registration process. It may be simpler to state the applicability as follows related to the TOP: "Transmission Operator of Bulk Electric System (BES) facilities and/or any non-BES facilities, deemed materially important to the BES by the Regional Entity." We believe the SDT should avoid the word "critical" as it may cause confusion with the CIP references to Critical Assets.
Midwest ISO	No	We agree with the drafting team's intent to eliminate the burden on a Transmission Operator that just has a radial connection to the BES under 200 kV by limiting TOP applicability. However, this is a registration issue and really identifies an issue with the definition of the BES. A standard is not the proper place to address registration and BES definition issues. The applicability should be just to the TOP and any limitation should be handled in registration. TOPs operating only radial transmission lines serving load are already excluded from registering per Section 501 sub-section 1.2.3 of the NERC Rules of Procedure. Limiting applicability further than this on radial transmission lines in essence redefines the BES and that is not a function of a standard. Please remove the language limiting the applicability. We urge the drafting team to communicate the need to limit applicability of certain requirements in the registration process. This is a broader problem that NERC needs to resolve.
CenterPoint Energy	No	CenterPoint Energy believes the applicability should not include the vague, fill-in-the-blank provision of "?or Facilities demonstrated by the Regional Entity to be critical to the reliability of the Bulk Electric System." This provision leaves it open to the whim of a Regional Entity to conjure some rationale to "demonstrate", by whatever means, that these requirements should apply to an otherwise exempt entity. Adding to the vagueness of the language is that it is not clear to whom the Regional Entity would make such a "demonstration". If the Regional Entity "demonstrates" the alleged criticality to itself, the problems with the proposed language should be self-evident to even the most naive proponent. Even if the "demonstration" is to an independent, competent, and trustworthy third party (all of which cannot be assumed without specificity of who the independent third party would be), it is unclear what due process is afforded to otherwise exempt entities to argue the facts asserted by the Regional Entity and to argue the reasonableness of the vague, undefined "demonstration" criteria used by the Regional Entity to make its assertion of criticality to the reliability of the BES. CenterPoint Energy recommends that this vague, fill-in-the-blank provision be deleted.
PJM Interconnection	No	In 4.1.2, the SDT creates a new class of TOP. This is beyond the Scope of the Standard. 4.1.2 can only apply to current functional entities.

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Organization	Question 1:	Question 1 Comments:
Entergy System Planning & Operations (Generation & Marketing)	No	
<p><b>Response:</b> Based on your comment and many others, the SDT has decided to remove all qualifying language from 4.1.2 and list only “Transmission Operator.” We believe, and in addition are convinced by comments received, that the NERC “Statement of Compliance Registry Criteria (Revision 5.0)” and Section 501 (specifically Section 501 1.2.3) of the NERC Rules of Procedure satisfactorily addresses which entities should be registered as a TOP, and therefore, subject to the applicable provisions of this standard.</p> <p><del>4.1.2 Transmission Operator operating Facilities at 200 kV or above, or non-radial Facilities above 100 kV, or Facilities demonstrated by the Regional Entity to be critical to the reliability of the Bulk Electric System (BES).</del></p>		
Western Area Power Administration	No	Please define radial/non-radial; Is the definition radial to load, radial to generation, radial to both load and generation?
<p><b>Response:</b> Because the SDT is removing all qualifying language from 4.1.2 and will be listing only “Transmission Operator” in a revised 4.1.2, the definition of radial/non-radial would be most appropriately addressed through the NERC/Regional Entity registration process, not the standards development process.</p> <p><del>4.1.2 Transmission Operator operating Facilities at 200 kV or above, or non-radial Facilities above 100 kV, or Facilities demonstrated by the Regional Entity to be critical to the reliability of the Bulk Electric System (BES).</del></p>		
Santee Cooper	No	<p>In 4.1.2 (Applicability) it is not clear that it is for a radial connection to the BES under 200 kV. There could be differences in what a regional entity deems critical to the reliability of the BES and what a TOP deems critical to the reliability of the BES. Would this allow a Regional Entity to require a TOP with radial facilities deemed critical by the RE to have a backup control center?</p> <p>Suggestion for rewording of 4.1.2: Transmission Operator ?. or radial facilities under 200 kV demonstrated by the Regional Entity to be critical to the reliability of the BES.</p>
<p><b>Response:</b> Based on the current draft of the standard, an applicable TOP would be required to have backup <u>functionality</u>, not a backup control</p>		

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Organization	Question 1:	Question 1 Comments:
<p>center. A TOP could accomplish this with a backup control center, but it could also accomplish this with backup functionality at a third party location, or via contracted services. Due to comments received, we are relying on the NERC registration process to identify the TOPs that would be subject to applicable provisions of the standard. This eliminates the need for qualifying language in 4.1.2 of the standard, and we will list only "Transmission Operator" in the revised 4.1.2.</p> <p><del>4.1.2 Transmission Operator operating Facilities at 200 kV or above, or non-radial Facilities above 100 KV, or Facilities demonstrated by the Regional Entity to be critical to the reliability of the Bulk Electric System (BES).</del></p>		
<p>Brazos Electric Power Cooperative, Inc.</p>	<p>No</p>	<p>This new definition basically brings in all TO's that operate transmission lines 100 kV and above given the NERC definition of a Transmission Operator (The entity responsible for the reliability of its 'local' transmission system?) and the emphasis now on Facilities. This new applicability is much broader than the original version and does not eliminate any burden on TO's, it could in fact be quite the opposite. The new applicability does not seem to match the intent of the old language. Taken literally this means that almost all TO's in ERCOT must have a backup control center. In the past we viewed this Standard applied to ERCOT, the one who directs the operation of the BES, not just a 'local' area. If the intent is to require more TO's to have backup control centers we are against this new concept because of the very small probability of ever losing the primary control center. As this happens so infrequently we feel it is not in the best interest of the electric customers to provide something that will have little benefit or any benefit ever. However, if this standard can be assigned to an entity such as ERCOT by each TO to which this applies then we can accept that concept but not all the new language. The last part of 4.1.2 is ambiguous in several ways. How are Facilities 'demonstrated' to be Critical and to whom and under what criteria? This language is not well thought out. The old 4.1.2, while not great, was better than the new one. The use of the word 'control' leads us to believe that the TO who has the final authority or 'control' of the facilities (small 'f', not capital 'F' for facilities), should have the backup control center and thus we assumed this to be ERCOT. We see no reason for this to change.</p>
<p><b>Response:</b> Based on your comment and many others, the SDT has decided to remove all qualifying language from 4.1.2 and list only "Transmission Operator." We believe, and in addition are convinced by comments received, that the NERC "Statement of Compliance Registry Criteria (Revision 5.0)" and Section 501 (specifically Section 501 1.2.3) of the NERC Rules of Procedure satisfactorily addresses which entities should be registered as a TOP, and therefore, subject to the applicable provisions of this standard. It is important to understand that this standard applies to TOPs, not TOs that are not also a TOP.</p> <p>In addition, TOPs under the current draft of this standard would be required to have backup <u>functionality</u>, not a backup control center. A TOP could accomplish this with a backup control center, but it could also accomplish this with backup functionality at a third party location, or via contracted services.</p>		

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Organization	Question 1:	Question 1 Comments:
<p>Finally, NERC's "Statement of Compliance Registry Criteria (Revision 5.0)" states that a TOP is "an entity that operates an <u>integrated</u> transmission element associated with the bulk power system 100 kV and above ....." This indicates that an entity responsible for only radial transmission lines may not be registered as a TOP, unless such facilities are "defined by the Regional Entity necessary for the reliable operation of the interconnected transmission grid" or if a sub-100 kV facility "is included on a critical facility list that is defined by the Regional Entity."</p> <p><del>4.1.2 Transmission Operator-operating Facilities at 200 kV or above, or non-radial Facilities above 100 KV, or Facilities demonstrated by the Regional Entity to be critical to the reliability of the Bulk Electric System (BES).</del></p>		
AEP	No	<p>"Facilities demonstrated by the Regional Entity to be critical to the reliability of the Bulk Electric System (BES)" needs to be clearly defined. Each regional entity must have a documented process for defining critical facilities.</p>
<p><b>Response:</b> As the SDT is eliminating the qualifying language for TOPs in 4.1.2 in this standard, we are leaving issues related to determining criticality to the NERC/Regional Entity registration process. This is primarily addressed in the NERC "Statement of Compliance Registry Criteria (Revision 5.0)." The SDT agrees that Regional Entities must have a documented process for determining critical facilities, must clearly identify critical facilities, and notify the facility owners with sufficient time to address applicable standards requirements.</p> <p><del>4.1.2 Transmission Operator-operating Facilities at 200 kV or above, or non-radial Facilities above 100 KV, or Facilities demonstrated by the Regional Entity to be critical to the reliability of the Bulk Electric System (BES).</del></p>		
Bureau of Reclamation	No	<p>In the applicability of the current draft, the term "Regional Entity" appears. This term is not a NERC defined term, nor is it added for this document, so to whom or what it refers is unclear. What entity(s) are expected to demonstrate the criticality? Is this Entity the RRO, a RC, or some other party? In addition the term "non radial" is not clear, is it non-radial with respect to generation and/or load? The applicability should be for all Transmission Operators, with a provision to allow them to be granted a waiver from their RRO if that TOP can demonstrate why the standard should not apply to them.</p>
<p><b>Response:</b> Regional Entities (REs) are the entities that NERC has delegated compliance and enforcement responsibilities to through FERC approved delegation agreements. REs essentially are the former Regional Reliability Organizations (RROs) that the industry is familiar with. More information about the eight REs can be found at <a href="http://www.nerc.com/page.php?cid=1 9 119">http://www.nerc.com/page.php?cid=1 9 119</a>. Because the SDT is eliminating the qualifying language for TOPs in 4.1.2 in this standard, we are leaving issues related to radial facilities to the NERC/Regional Entity registration process. All registered entities have the right to challenge the functions they are registered for. A waiver provision is not needed in this standard as the registration process is the appropriate venue for such challenges.</p> <p><del>4.1.2 Transmission Operator-operating Facilities at 200 kV or above, or non-radial Facilities above 100 KV, or Facilities demonstrated by the</del></p>		

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Organization	Question 1:	Question 1 Comments:
<del>Regional Entity to be critical to the reliability of the Bulk Electric System (BES).</del>		
Puget Sound Energy	Yes	<p>Since there are many differences in size and effect on the BES of the many registered TOPs, there should be a mechanism where the RRO or RC determines the level of risk an entity poses to their area should they lose their control center. Just because a small entity has a line or two that fits the all encompassing definition of BES, does not place the same burden on the system as a large path operator with hundreds of lines. Some entities are large enough where they should have a staffed backup facility. Implementation of costly plans simply due to a registration type that does nothing to increase reliability should be avoided. Costs are passed on to customers. Simply stating it is for reliability does not justify it to them.</p>
<p><b>Response:</b> The issues identified in your comments are best addressed in the entity registration process and through revisions to the NERC Rules of Procedures and/or the NERC “Statement of Compliance Registry Criteria (Revision 5.0).” The standards development process is not the appropriate place to address the issues you have presented.</p>		
WECC Reliability Coordinator Comment Working Group	Yes	
San Diego Gas and Electric	Yes	
ComEd / Exelon	Yes	
Progress Energy Carolinas, Inc.	Yes	
Southern Company	Yes	

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Organization	Question 1:	Question 1 Comments:
Transmission		
Xcel Energy	Yes	
Duke Energy	Yes	
Electric Reliability Council of Texas, Inc.	Yes	
MRO NERC Standards Review Subcommittee	Yes	
Oncor Electric Delivery	Yes	
Independent Electricity System Operator	Yes	
Progress Energy-Florida	Yes	
Pepco Holdings, Inc. - Affiliates	Yes	
ReliabilityFirst Corporation	Yes	

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Organization	Question 1:	Question 1 Comments:
Bonneville Power Administration	Yes	
Dynergy	Yes	
<b>Response:</b> Thank you for your response.		

2. The SDT has made the transition timeframes equivalent for all applicable entities as shown in Requirement R1.5. Do you agree with this change? If not, please provide specific suggestions for improvement.

**Summary Consideration:**

The vast majority of the respondents supported the position of the SDT on this issue so no substantial changes have been made to the transition timeframe cited in the standard. However, the following requirements were changed for clarity due to industry comments:

**R1.5** A transition period between the loss of primary control center functionality and the time to fully implement the backup functionality that is less than or equal to ~~plan and get backup functionality up and running that is less than~~ two hours.

**R1.6** An Operating Process describing the actions to be taken during the transition period between the loss of primary control center functionality and the time ~~to~~ to fully implement the backup functionality elements identified in Requirement R1.2 ~~get backup functionality up and running~~. The Operating Process shall include at a minimum:

**R8.1** ~~A demonstration of t~~The transition time between the loss of primary control center functionality and the time to fully implement the backup functionality ~~initiation of backup functionality~~.

Organization	Question 2:	Question 2 Comments:
Entergy System Planning & Operations (Generation & Marketing)	No	It is not apparent as to the basis for this number. Is it arbitrary or based on some technical concern? State as such. A statistical risk analysis would be ideal to determine this allowable time, if a valid model exists. If an arbitrary value is used, then an industry survey or something similar (experts/EPRI) may be appropriate (e.g. EPRI Project RP2473-68)
ISO/RTO Council	No	We agree with and thank the drafting team for making the timeframes equivalent. However, we continue to believe that the new requirement is actually less stringent than the existing requirement. While the new requirement specifies that the backup plan must be implemented in two or less hours, the existing requirement specifies that interim provisions must be made if it will take more than one hour to implement the backup capability. Thus, even if the backup capability is not fully implemented within one hour, the responsible entity still has to have an alternative to operate without the primary control center within an hour. We also question what the 2 hours is based on. Have industry surveys or compliance audit results been utilized that demonstrate that two hours is required to fully implement the back up capability plan instead of the one? We recommend changing the

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Organization	Question 2:	Question 2 Comments:
		implementation time back to one hour.
<p><b>Response:</b> The SDT believes two hours was broad enough to capture the very different business/risk decisions that have been made in the past regarding backup control centers (weighing the value of greater geographic separation over the need for rapid response), but also tight enough for entities to develop mitigations to address the maximum two hour transition period. The SDT believes that the new standard has significantly moved beyond the old standard (original Version 0, R1.8) by requiring immediate management of the risks.</p>		
Progress Energy Carolinas, Inc.	No	<p>Transition Period — Different transition period requirements are needed in order to correlate with the various reasons that a primary control center can be lost. A blanket 2-hour requirement forces a backup site to be within approximately 60–90 miles of the primary site to cover the scenario of the quick loss (“crater”) of the primary center, where offsite personnel must travel from a non-business location to the backup site. However, this distance is insufficient to protect against the loss of both the primary and backup centers due to a major storm, such as a hurricane. Either the transition period needs to be increased to 4 hours, or exceptions are needed for centers located in hurricane-prone areas. Clarification requested as to what constitutes "loss of primary control center functionality" and what constitutes "backup functionality up and running"? Is the functionality to mean at a minimum the aggregate abilities to monitor/maintain frequency, perform AGC, calculate ACE, and perform interchange scheduling (for BA's) and/or for TA's, the minimum aggregate abilities to monitor and control transmission system voltages, power flows, the switching of transmission elements, and ability to respond to IROL's and SOL's violations? Suggest better definition which would identify the minimum as being any one (or all) of the following:</p> <ul style="list-style-type: none"> <li>– loss of ability to monitor and provide basic tie line control for maintaining the status of all inter-area schedules,</li> <li>–loss of ability to monitor and control critical transmission facilities, generation control, voltage control, time and frequency control, control of critical substation devices, and logging of significant power system events.</li> <li>– loss of ability to maintain basic voice communication capabilities with other areas.</li> </ul>
Progress Energy-Florida	No	<p>Transition Period — Different transition period requirements are needed in order to correlate with the various reasons that a primary control center can be lost. A blanket 2-hour requirement forces a backup site to be within approximately 60–90 miles of the primary site to cover the scenario of the quick loss (“crater”) of the primary center, where offsite personnel must travel from a non-business location to the backup site. However, this distance is insufficient to protect against the loss of both the primary and backup centers due to a major storm, such as a hurricane. Either the transition period needs to be increased to 4 hours, or exceptions are needed for centers located in hurricane-prone areas. Clarification requested as to what constitutes "loss of primary control center functionality" and what constitutes "backup functionality up and running"? Is the functionality to mean at a minimum the aggregate abilities to monitor/maintain frequency, perform AGC, calculate ACE, and perform interchange</p>

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Organization	Question 2:	Question 2 Comments:
		<p>scheduling (for BA's) and/or for TO's, the minimum aggregate abilities to monitor and control transmission system voltages, power flows, the switching of transmission elements, and ability to respond to IROLs and SOLs violations? Suggest better definition which would identify the minimum as being any one (or all) of the following:</p> <ul style="list-style-type: none"> <li>-- loss of ability to monitor and provide basic tie line control for maintaining the status of all inter-area schedules,</li> <li>--loss of ability to monitor and control critical transmission facilities, generation control, voltage control, time and frequency control, control of critical substation devices, and logging of significant power system events.</li> <li>-- loss of ability to maintain basic voice communication capabilities with other areas.</li> </ul>
<p><b>Response:</b> Regarding the request for the SDT to correlate the transition period to the various reasons a control center could be lost would most likely result in the SDT making a very complex standard that still could not possibly address the number of permutations for the loss of a control center.</p> <p>Regarding clarification as to what constitutes "loss of primary control center functionality," R1.4 specifies that the Operating Plan includes: "Operating Procedures, including decision authority, for use in determining when to implement the Operating Plan for backup functionality." The intention of the SDT is to allow the entity to make the determination that a loss of primary control center functionality has occurred, and when to implement the Operating Plan. The SDT suggests the entity may consider factors, such as, but not limited to: natural disasters, fire, smoke, other inhabitability issues, and control center equipment degradation/failure that precludes continuing operations from the primary control center.</p> <p>Regarding clarification of the term "backup functionality up and running", the SDT believes implementing the modifications specified by Duke Energy in the section below will enhance the standard's clarity.</p>		
Duke Energy	No	<p>We agree that two hours is appropriate for all applicable entities. However we think more clarity is needed on exactly what is required within two hours.</p> <p>R1.5 should be revised as follows: "A transition period between the loss of primary control center functionality and the time to fully implement the backup functionality elements identified in R1.2 that is less than or equal to two hours".</p> <p>R1.6 should be revised as follows: "An Operating Process describing the actions to be taken during the transition period between the loss of primary control center functionality and the time to fully implement the backup functionality elements identified in R1.2. The Operating Process shall include, at a minimum:".</p> <p>R8.1 should be revised as follows: "A demonstration of the transition time between the loss of primary control center functionality and the time to fully implement the backup functionality elements identified in R1.2".</p>
<p><b>Response:</b> The SDT agrees with the recommended re-wording for R1.5, R1.6, and R8.1 using the reference of R1.2 provides the clarification which is being requested by Progress's comments (above). Thank you for suggesting alternative wording.</p>		

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Organization	Question 2:	Question 2 Comments:
		<p><b>R1.5</b> <del>A transition period between the loss of primary control center functionality and the time to fully implement the backup <u>functionality that is less than or equal to plan and get backup functionality up and running that is less than</u> two hours.</del></p> <p><b>R1.6</b> <del>An Operating Process describing the actions to be taken during the transition period between the loss of primary control center functionality and the time <del>to</del> to fully implement the backup functionality elements identified in Requirement R1.2<del>get backup functionality up and running</del>. The Operating Process shall include <u>at a minimum</u>:</del></p> <p><b>R8.1</b> <del>A demonstration of t</del>The transition time between the <u>loss of primary control center functionality and the time to fully implement the backup functionality initiation of backup functionality</u>.</p>
Santee Cooper	No	We recommend that R1.5 be changed such that the backup plan be implemented in less than two hours and the backup functionality up and running that is less than three hours. Smaller entities that need a larger physical separation between control centers will need at least three hours to get backup functionality up and running.
<p><b>Response:</b> The SDT intended the time of 2 hours to be the top most limit for registered entities to have implemented enough of its plan to have restored functionality as described in R1.2. Increasing the time limit is contrary to most of the other comments received.</p>		
Hydro-Québec TransÉnergie (HQT)	No	<p>In the previous version of the Standards, the TOP and BA had a leeway for interim provisions to be included in the plan when extenuating circumstances cause the transition to take longer than two hours (See R8.1 and R8.2 in the redline version). HQT asked to have a similar leeway for the RC. In the current version, that leeway has been removed for all of them. In the answers provided by the SDT, it seems that they assume that facilities for the RC are in another location than that of the BA and TOP. While this might be true for others, for HQT they are all in the same location.</p> <p>HQT propose that that a bullet be added in R1.6.3 that reads: "Interim provisions must be included in the plan when extenuating circumstances cause the transition to take longer than two hours for the RC, TOP and BA"</p>
<p><b>Response:</b> The SDT never assumed that registered entities that were TOP's, RC's, and BA's were operating these functions from different sites so this notion did not drive the standard's development. The SDT evaluated the possibility of providing for interim provisions; however, interim provisions could result in each registered entity having a different time limit that would make the standard very hard to evaluate. The SDT believes that 2 hours is a reasonable maximum for registered entities to reestablish their critical functionality in order to ensure the reliability of the interconnection. The SDT believes that the new standard has significantly moved beyond the old standard (original Version 0, R1.8) by requiring immediate management of the risks.</p>		
PJM Interconnectio n	No	The transition timeframe should be defined and justified by the respondent, and be made part of their Operating Plan.

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Organization	Question 2:	Question 2 Comments:
<p><b>Response:</b> The SDT believes the intent of this standard is to reduce the interconnections' risk during periods when registered entities need to utilize their backup control centers; providing each registered entity the flexibility to define its own timeframe may not achieve this intent. Therefore, no change was made.</p>		
Northeast Utilities	Yes	
Midwest ISO	Yes	
Consumers Energy Company	Yes	
WECC Reliability Coordinator Comment Working Group	Yes	
Puget Sound Energy	Yes	
San Diego Gas and Electric	Yes	
ComEd / Exelon	Yes	
Manitoba Hydro	Yes	
Sierra Pacific	Yes	This is an improvement to the Standard.

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Organization	Question 2:	Question 2 Comments:
Power Co. (dba NV Energy)		
NPCC	Yes	
Southern Company Transmission	Yes	
Xcel Energy	Yes	
Energy Services, Inc	Yes	
Electric Reliability Council of Texas, Inc.	Yes	
MRO NERC Standards Review Subcommittee	Yes	
ITC	Yes	
CenterPoint Energy		
Oncor Electric Delivery	Yes	

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Organization	Question 2:	Question 2 Comments:
Western Area Power Administration	Yes	
ISO New England Inc	Yes	
Pepco Holdings, Inc. - Affiliates	Yes	
ReliabilityFirst Corporation	Yes	
Bonneville Power Administration	Yes	
Dynegy	Yes	
AEP	Yes	The extended transition period increases the criticality of R1.6.
Ameren	Yes	
FirstEnergy Corp.	Yes	We agree that the transition time frames should be equivalent for all applicable entities.
Bureau of Reclamation	Yes	
<b>Response:</b> Thank you for your response.		

**3. The SDT has included VRFs and Time Horizons with this posting. Do you agree with the assignments that have been made? If not, please make specific suggestions for improvement.**

**Summary Consideration:** The majority of the responses received supported the SDT VRF assignments and consequently, no changes have been made to the assigned VRF due to industry comments.

Organization	Question 3:	Question 3 Comments:
NPCC	No	We agree with the VRFs for R1 to R8 but not R9. We assess the reliability impact of (R9) failure to come up with a plan 6 months after an entity has experienced a loss of its primary control center or backup capability and expects such loss to last for 6 months or more is lower than any of the other requirements that are assigned a Medium VRF. We therefore suggest a Lower be assigned to this requirement.
ISO New England Inc	No	We agree with the VRFs for R1 to R8 but not R9. We assess the reliability impact of (R9) failure to come up with a plan 6 months after an entity has experienced a loss of its primary control center or backup capability and expects such loss to last for 6 months or more is lower than any of the other requirements that are assigned a Medium VRF. We therefore suggest a Lower be assigned to this requirement.
Independent Electricity System Operator	Yes	We agree with the VRFs for R1 to R8 but not R9. We assess the reliability impact of (R9) - that failure to come up with a plan 6 months after an entity has experienced a loss of its primary control centre or backup capability and expects such loss to last for 6 months or more - is lower than any of the other requirements that are assigned a Medium VRF. We therefore suggest a Lower VRF be assigned to this requirement.
Hydro-Québec TransÉnergie (HQT)	No	We agree with the VRFs for R1 to R8 but not R9. We assess the reliability impact of (R9) failure to come up with a plan 6 months after an entity has experienced a loss of its primary control center or backup capability and expects such loss to last for 6 months or more is lower than any of the other requirements that are assigned a Medium VRF. We therefore suggest a Lower be assigned to this requirement.
<p><b>Response:</b> The SDT cannot justify reducing the VRF for R9. Going without a plan to restore backup functionality beyond six months could affect “the ability to effectively monitor and control the bulk electric system” as per the definition of a Medium VRF. Therefore, the SDT believes that the proposed VRF is appropriate.</p>		
ITC	No	Per comments made elsewhere, requirement 6 should be part of requirement 1 and therefore have a Medium VRF.

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Organization	Question 3:	Question 3 Comments:
<p><b>Response:</b> Requirement R1 addresses the content of the plan, while Requirement R6 addresses the timeliness of reviews and updates. While it is certainly a judgment call, the SDT believes that Requirement R6 is more of an administrative requirement and hence should continue to have a VRF as currently written.</p>		
ISO/RTO Council	No	<p>R7 should be a sub-requirement of R1. Thus, it should not have a VRF. The VRF for R8 should be lower. Given that the Operating Plan needs to be tested more frequently than annually to ensure that the backup capability is available when it is needed, this requirement is clearly intended to be administrative. Requirement 9 should be removed from the standard. This is, in essence, a requirement for an N-2 contingency. It is such a rare occurrence to operate from a backup center for an extended period of time that this requirement is not needed. If the RC, TOP or BA must operate from their backup center or utilizes their backup capability for an extended period of time, they should work with NERC and the Regional Entity to address the specific situation rather than having a requirement that dictates a time frame. We assess the reliability impact of (R9) failure to come up with a plan 6 months after an entity has experienced a loss of its primary control center or backup capability and expects such loss to last for 6 months or more is lower than any of the other requirements that are assigned a Medium VRF. We therefore suggest a Lower VSL be assigned to this requirement if the requirement is retained.</p>
Midwest ISO	No	<p>R7 should be a sub-requirement of R1. Thus, it should not have a VRF. The VRF for R8 should be lower. Given that the Operating Plan needs to be tested more frequently than annually to ensure that the backup capability is available when it is needed, this requirement is clearly intended to be administrative. Requirement 9 should be removed from the standard. This is, in essence, is a requirement for an N-2 contingency. It is such a rare occurrence to operate from a backup center for an extended period of time that this requirement is not needed. If the RC, TOP or BA must operate from their backup center or utilizing their backup capability for an extended period of time, they should work with NERC and the Regional Entity to address the specific situation rather than having a requirement that dictates a time frame.</p>
Ameren	No	<p>R7 should be a sub-requirement of R1. Thus, it should not have a VRF. The VRF for R8 should be lower. Given that the Operating Plan needs to be tested more frequently than annually to ensure that the backup capability is available when it is needed, this requirement is clearly intended to be administrative. Requirement 9 should be removed from the standard. This is, in essence, is a requirement for an N-2 contingency. It is such a rare occurrence to operate from a backup center for an extended period of time that this requirement is not needed. If the RC, TOP or BA must operate from their backup center or utilizing their backup capability for an extended period of time, they should work with NERC and the Regional Entity to address the specific situation rather than having a requirement that dictates a time frame.</p>
<p><b>Response:</b> The SDT believes that Requirement R7 is a standalone requirement as Requirement R1 covers the plan and Requirement R7 the capabilities.</p>		

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Organization	Question 3:	Question 3 Comments:
<p>However, Requirement R7 has been re-written to provide additional clarity as to what was the intent of the SDT.</p> <p><b>R7.</b> Each Reliability Coordinator, Balancing Authority, and <del>applicable</del>-Transmission Operator shall have <u>primary and backup capabilities</u> that <del>do</del> not depend on <del>the primary control center</del> <u>each other or any single data center</u> for any functionality required to maintain compliance with Reliability Standards <u>that depend on the primary control functionality</u>.</p> <p>The SDT believes that R8 is not administrative. If a plan is not routinely tested, it is likely that weaknesses in the plan will not be identified and remedied. Accordingly we believe that failure to test the plan could affect BES reliability and no change has been made.</p> <p>Requirement R9 is not intended to be an N-2 contingency. It addresses the need for an entity to restore itself to N-1 after it has suffered what we agree is a very rare contingency. We agree that flexibility is required to address the specific situation encountered; that is why the requirement is for a <u>plan</u> to restore functionality instead of actual restoration. The SDT cannot justify reducing the VRF for R9. Going without a plan to restore backup functionality beyond six months could affect “the ability to effectively monitor and control the bulk electric system” as per the definition of a Medium VRF. Therefore, the SDT believes the proposed VRF is appropriate.</p>		
Consumers Energy Company	Yes	
WECC Reliability Coordinator Comment Working Group	Yes	
Puget Sound Energy	Yes	
San Diego Gas and Electric	Yes	
ComEd / Exelon	Yes	
Entergy System Planning & Operations (Generation & Marketing)	Yes	
Manitoba Hydro	Yes	

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Organization	Question 3:	Question 3 Comments:
Sierra Pacific Power Co. (dba NV Energy)	Yes	The VRF's and Time Horizons appear to be appropriate.
Progress Energy Carolinas, Inc.	Yes	
Southern Company Transmission	Yes	
Duke Energy	Yes	
Electric Reliability Council of Texas, Inc.	Yes	
MRO NERC Standards Review Subcommittee	Yes	
Oncor Electric Delivery	Yes	
Western Area Power Administration	Yes	
Progress Energy-Florida	Yes	
Pepco Holdings, Inc. - Affiliates	Yes	
Santee Cooper	Yes	
ReliabilityFirst	Yes	

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Organization	Question 3:	Question 3 Comments:
Corporation		
Bonneville Power Administration	Yes	
PJM Interconnection	Yes	
AEP	Yes	
FirstEnergy Corp.	Yes	
Bureau of Reclamation	Yes	
Northeast Utilities	Yes	
<p><b>Response:</b> Thank you for your response.</p>		

4. The SDT has included Measures and Data Retention with this posting. Do you agree with the assignments that have been made? If not, please make specific suggestions for improvement.

**Summary Consideration:**

There were no major problems expressed with the measures or data retention requirements. However, there were several requests for clarity with request to measures. The SDT has reviewed these and made the following changes based on industry comments:

**R3.** Each [Reliability Coordinator, Balancing Authority, and applicable](#) Transmission Operator directing BES operations through other entities shall [ensure that backup functionality exists for the BES operations performed through those other entities.](#) ~~include provisions for the loss of such entity's control functionality in its Operating Plan for backup functionality.~~

**R7.** Each Reliability Coordinator, Balancing Authority, and ~~applicable~~ Transmission Operator shall have [primary and](#) backup capability ~~yes~~ that does ~~es~~ not depend on ~~the primary control center each other or any single data center~~ for any functionality required to maintain compliance with Reliability Standards [that depend on the primary control functionality.](#)

**M1.** Each Reliability Coordinator, Balancing Authority, and ~~applicable~~ Transmission Operator shall have a dated, current, in force Operating Plan for backup functionality in accordance with Requirement R1, in electronic or hardcopy format, ~~, with evidence of its last issue, describing the manner in which it ensures reliable operations of the BES in the event that its primary control center becomes inoperable.~~

**M2.** Each Reliability Coordinator, Balancing Authority, and ~~applicable~~ Transmission Operator shall have a dated, current, in force copy of its Operating Plan for backup functionality in accordance with Requirement R2, in electronic or hardcopy format, ~~with evidence of its last issue, located~~ [available](#) in its primary control center and at the location supporting backup functionality.

**M3.** Each [Reliability Coordinator, Balancing Authority, and applicable](#) Transmission Operator directing BES operations through other entities shall provide evidence that it has [ensured that backup functionality exists for the BES operations performed through those other entities](#) ~~included provisions for the loss of such entity's control functionality in its dated, current, in force Operating Plan for backup functionality, with evidence of its last issue,~~ for backup functionality in accordance with Requirement R3.

**M4.** Each Reliability Coordinator shall provide dated evidence ~~that it has demonstrated~~ that it has a backup control center facility (provided through its own dedicated backup facility or at another entity's control center [with certified Reliability Coordinator operators](#)) that provides the functionality required for maintaining compliance with all Reliability Standards ~~applicable to the Reliability Coordinator that depend on primary control center functionality~~ in accordance with Requirement R4.

**M5.** Each Balancing Authority and ~~applicable~~ Transmission Operator shall provide dated evidence ~~that it has demonstrated~~ that [it's](#) backup functionality (provided either through a backup control center facility or contracted services) includes monitoring, control,

logging, and alarming sufficient for maintaining compliance with all Reliability Standards ~~applicable that depend on~~ a Balancing Authority or Transmission Operator's primary control center functionality respectively in accordance with Requirement R5.

**M6.** Each Reliability Coordinator, Balancing Authority, and ~~applicable~~ Transmission Operator, shall have evidence that it's dated, current, in force Operating Plan for backup functionality, in electronic or hardcopy format, ~~with evidence of its last issue,~~ has been reviewed and approved annually and that it has been updated within sixty calendar days of any changes to the ~~backup location,~~ capabilities described in Requirement R1, ~~or contact information~~ in accordance with Requirement R6.

**M7.** Each Reliability Coordinator, Balancing Authority, and ~~applicable~~ Transmission Operator shall have dated evidence that its primary and backup capability ~~ies~~ does not depend on each other or any common facility ~~the primary control center~~ for any functionality required to maintain compliance with Reliability Standards that depend on the primary control functionality in accordance with Requirement R7.

**M8.** Each Reliability Coordinator, Balancing Authority, and ~~applicable~~ Transmission Operator shall provide evidence such as dated records, that it has completed and documented its annual tested of its ~~dated, current, in force~~ Operating Plan for backup functionality, ~~with evidence of its last issue, and that test results and lessons learned from such testing are noted and incorporated in subsequent revisions of its Operating Plan for backup functionality~~ in accordance with Requirement R8.

**R8 VSL**

R8.	The Reliability Coordinator, Balancing Authority, or <del>applicable</del> Transmission Operator <del>has provided evidence, such as dated records, that it</del> has <u>annually</u> tested its <del>dated, current, in force</del> Operating Plan for backup functionality, <u>but one of the following occurred: 1) the demonstration was with evidence of its last issue, through actual implementation or test operations</u> for less than two continuous hours, <del>2) or</del> it has failed to demonstrate that the transition time period is less than	<u>The Reliability Coordinator, Balancing Authority, or Transmission Operator has annually tested its Operating Plan for backup functionality, but two of the following occurred: 1) the demonstration was for less than two continuous hours, 2) it has failed to demonstrate that the transition time period is less than or equal to two hours, or 3) test results were not documented. N/A</u>	<u>The Reliability Coordinator, Balancing Authority, or Transmission Operator has annually tested its Operating Plan for backup functionality, but all three of the following occurred: 1) the test demonstration was for less than two continuous hours, 2) it has failed to demonstrate that the transition time period</u>	The Reliability Coordinator, Balancing Authority, or <del>applicable</del> Transmission Operator has not annually tested its <del>dated, current, in force</del> Operating Plan for backup functionality.
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	<p>or equal to two hours, <del>or it was done in more than twelve calendar months or 3 3) test results and lessons learned were not incorporated documented in subsequent revisions of the Operating Plan for backup functionality.</del></p>		<p><u>is less than or equal to two hours, and 3) test results were not documented.</u> <del>N/A</del></p>	
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Organization	Question 4:	Question 4 Comments:
Consumers Energy Company	No	<p>M7. calls for "shall have dated evidence that its backup capability does not depend on the primary control center for any functionality required to maintain compliance with Reliability Standards in accordance with Requirement R7." This is subjective as to what that evidence consists of and leaves too much to interpretation. Is a letter stating there is no dependence suffice? Will it suffice regardless of who the auditor is?</p>
<p><b>Response:</b> Requirement R7 was retained as a concept from the current version of EOP-008 because the SDT believes there is tremendous value in ensuring that backup capabilities not depend upon the primary control center. Measure M7 is an attempt to put terms of measurability around the language of this requirement, without being so prescriptive that we define what that evidence has to be. Measure M7 was revised in an attempt to clarify the intent of the SDT. The SDT cannot supply answers to specific compliance questions.</p> <p><b>M7.</b> Each Reliability Coordinator, Balancing Authority, and <del>applicable</del>-Transmission Operator shall have dated evidence that its <u>primary and backup capability</u> <del>ies</del> <u>does not depend on each other or any common facility</u> <del>the primary control center</del> for any functionality required to maintain compliance with Reliability Standards that <u>depend on the primary control functionality</u> in accordance with Requirement R7.</p>		
Puget Sound Energy	No	<p>M.3 - There needs to be clarification in either the requirement or the measure as to the definition of "directing", "entity" and "control functionality". Was this intended to be the TOP that is acting as a host for a DP, or say a GOP? Does the loss of functionality mean a RTU being down now must be addressed in the loss of control center plan for the TOP? Does this even need to be a requirement since R.5 is so vague and encompassing? Why just the TOP and not BA's that are providing regulation services of acting as a host to others? The measurement and requirement are open to interpretation. Both need to be clear, concise and measurable.</p> <p>M.6 - The requirement and measure ask for approval. What level of approval does the SDT expect for this? If the SDT does not feel the need to specify, then why have it.</p>

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Organization	Question 4:	Question 4 Comments:
		<p>M.7 - The measure requires dated evidence of a negative statement. Proving a negative in an audit is not easy. Could a statement in the current, dated Operating Plan stating it does not rely on the primary facility be sufficient evidence? I know the SDT does not determine what is acceptable to an auditor, but measures asking for dated proof that something does not exist, did not happen or are not dependent should be avoided. Will I have to provide dated evidence that I did not lose my primary capability for six months in M.9 as well?</p> <p>M.8 Providing evidence that the Operating Plan and backup functionality were tested is definitely needed. The current wording of the requirement and measure could be interpreted as each version of the plan must be tested. If a test is done, and the plan is subsequently updated with lessons learned as required in R8.3, the new dated, current, in force plan would not have evidence of being tested. I know this is petty and just semantics, but compliance people may take it literally.</p>
<p><b>Response:</b> M3 – See response in question 7 related to suggested changes to R3. Both Requirement R3 and Measure M3 were revised to clarify the intent of the SDT.</p> <p><b>R3</b> – Each Reliability Coordinator, Balancing Authority, and applicable-Transmission Operator directing BES operations through other entities shall ensure that backup functionality exists for the BES operations performed through those other entities. <del>include provisions for the loss of such entity's control functionality in its Operating Plan for backup functionality.</del></p> <p><b>M3.</b> Each Reliability Coordinator, Balancing Authority, and applicable-Transmission Operator directing BES operations through other entities shall provide evidence that it has ensured that backup functionality exists for the BES operations performed through those other entities <del>included provisions for the loss of such entity's control functionality in its dated, current, in force Operating Plan for backup functionality, with evidence of its last issue,</del> for backup functionality in accordance with Requirement R3..</p> <p>M6 – The SDT did not specify who should approve the procedure because entities are structured differently, and may already have processes in place for the approval of operating procedures. Approval is required to ensure that the procedures have the authority of the operating level management or higher to enforce the implementation of the procedure.</p> <p>M7 &amp; M9 – The SDT feels that the measure is clear and that the proof is not burdensome. No change made.</p> <p>M8 – The SDT can understand how that would be a possible interpretation of M8 and has made wording changes for clarity.</p> <p><b>M8.</b> Each Reliability Coordinator, Balancing Authority, and applicable-Transmission Operator shall provide evidence such as dated records, that it has completed and documented its annual <del>tested of its dated, current, in force</del> Operating Plan for backup functionality, <del>with evidence of its last issue, and that test results and lessons learned from such testing are noted and incorporated in subsequent revisions of its</del> Operating Plan for backup functionality in accordance with Requirement R8.</p>		
Progress Energy	No	What is purpose of requiring Operating Plans to be retained for prior 3 years? It should be satisfactory to maintain current active plan with retention revisions of last full calendar year unless there has been a compliance violation identified by the

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Organization	Question 4:	Question 4 Comments:
Carolinas, Inc.		<p>Regional Compliance entity.</p> <p>R8 — Does a test in January of one year followed by a test in December of the following year meet the requirement of an “annual” test? If not, the wording here should match Violation Security Levels section D.2.R8.</p> <p>M5 — Does this require a document detailing each requirement of all Reliability Standards along with a description of how each is satisfied at the backup (similar to an audit response)? If not, what else can satisfy this measure?</p> <p>M7 — Does this require a document detailing each requirement of all Reliability Standards along with a description of how it is satisfied at the backup (similar to an audit response) without utilizing equipment at the primary? If not, what else can satisfy this measure?</p> <p>D.1.4, 5th bullet (related to M5) — Does this require a demonstration of adequate backup functionality to be repeated and documented at least once between compliance audits? This measure is not needed since R8/M8 requires an annual test with documentation.D.2.</p> <p>R8, Lower Level — States that a violation occurs if subsequent tests occur more than 12 months apart. Section B.R8 states that an annual test shall be conducted. Unless the term “annual” is defined as “every 12 months” in a reference document, these descriptions must match.</p>
Progress Energy-Florida	No	<p>What is purpose of requiring Operating Plans to be retained for prior 3 years? It should be satisfactory to maintain current active plan with retention of last full calendar year unless there has been a compliance violation identified by the Regional Compliance entity.</p> <p>R8 — Does a test in January of one year followed by a test in December of the following year meet the requirement of an “annual” test? If not, the wording here should match Violation Security Levels section D.2.R8.</p> <p>M5 — Does this require a document detailing each requirement of all Reliability Standards along with a description of how each is satisfied at the backup (similar to an audit response)? If not, what else can satisfy this measure?</p> <p>M7 — Does this require a document detailing each requirement of all Reliability Standards along with a description of how it is satisfied at the backup (similar to an audit response) without utilizing equipment at the primary? If not, what else can satisfy this measure?</p> <p>D.1.4, 5th bullet (related to M5) — Does this require a demonstration of adequate backup functionality to be repeated and documented at least once between compliance audits? This measure is not needed since R8/M8 requires an annual test with documentation.</p> <p>D.2.R8, Lower Level — States that a violation occurs if subsequent tests occur more than 12 months apart. Section B.R8</p>

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Organization	Question 4:	Question 4 Comments:		
		states that an annual test shall be conducted. Unless the term “annual” is defined as “every 12 months” in a reference document, these descriptions must match.		
<p><b>Response:</b> Data retention is an aspect of each standard. The intent of the SDT is to ensure that evidence and copies of the Operating Plan be retained for review by the compliance audit team since the last compliance audit, currently three years, although due to scheduling of audits, it is possible that the audit period may extend beyond 36 months. That is why the team recommends retaining data for three previous years, plus the current year.</p> <p>R8. As the standard is written the annual test could be performed at any point during that year, not just within twelve months of the previous year’s test.</p> <p>M5. The SDT anticipates that the Operating Plan including the elements of R5 would be sufficient to meet the requirement of M5 but the SDT can’t answer for what an auditor might require.</p> <p>M7. The measure is that evidence will be provided which could include a review, study, report, or some other appropriate type of evidence that the backup capabilities do not share a common point of failure with the primary control center. The type of document described in your comment is another type of evidence which could be used. The SDT cannot supply answers to specific compliance questions.</p> <p>D1.4. This is a data retention requirement that the dated evidence showing compliance with R5, and measured according to M5 be retained since the entity’s last compliance audit. It does not impose any additional demonstrations of backup functionality.</p> <p>R8 VSL for lower severity level violation: Agreed. As the standard is written the annual test could be performed at any point during that year, not just within twelve months of the previous year’s test. R8 VSL has been changed for clarity.</p> <p><b>R8 VSL</b></p>				
R8.	<p>The Reliability Coordinator, Balancing Authority, or <del>applicable</del>-Transmission Operator <del>has provided evidence, such as dated records, that it has</del> annually tested its <del>dated, current, in force</del>-Operating Plan for backup functionality, <del>but one of the following occurred: 1) the demonstration was with evidence of its last issue, through actual implementation</del></p>	<p><u>The Reliability Coordinator, Balancing Authority, or Transmission Operator has annually tested its Operating Plan for backup functionality, but two of the following occurred: 1) the demonstration was for less than two continuous hours, 2) it has failed to demonstrate that the transition time period is less than or equal to two hours,</u></p>	<p><u>The Reliability Coordinator, Balancing Authority, or Transmission Operator has annually tested its Operating Plan for backup functionality, but all three of the following occurred: 1) the <del>test</del>demonstration was for less than two continuous hours, 2) it has failed to</u></p>	<p>The Reliability Coordinator, Balancing Authority, or <del>applicable</del>-Transmission Operator has not annually tested its <del>dated, current, in force</del>-Operating Plan for backup functionality</p>

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Organization	Question 4:	Question 4 Comments:			
	<p><del>or test operations</del> for less than two continuous hours, <del>2)</del> or it has failed to demonstrate that the transition time period is less than or equal to two hours, <del>or it was done in more than twelve calendar months</del> <del>or 3) test results and lessons learned were not incorporated documented in subsequent revisions of the Operating Plan for backup functionality.</del></p>	<p><del>or 3) test results were not documented.</del> <del>N/A</del></p>	<p><del>demonstrate that the transition time period is less than or equal to two hours, and 3) test results were not documented.</del> <del>N/A</del></p>		
Entergy Services, Inc	No	<p>M4 and M5 contain the phrase "shall provide dated evidence that it has demonstrated that it has a (BCC)?" Measures should not include requirements. These measures include new requirements and unspecified additional measures on several unspecified entities. These measures include a requirement that the RC, BA or TOP "demonstrate" BCC functionality to some unspecified entity and then that unspecified entity must "provide dated evidence" to the RC, BA and TOP so the RC, BA and TOP can provide that "dated evidence" for evidence of compliance. This requirement for demonstration to, and approval by, some unspecified entity is not in the NERC standards. We suggest the demonstration aspect of these measures be deleted and the measures be changed to:</p> <p>"M4. Each Reliability Coordinator shall provide dated evidence that it has a backup control center facility ??."</p> <p>"M5. Each Balancing Authority and applicable Transmission Operator shall provide dated evidence that it's backup functionality?"</p>			
<p><b>Response:</b> The intent of M4 and M5 is just that an entity have dated evidence that it met R4 and R5 respectively. The wording of M4 &amp; M5 have been changed for clarity.</p> <p><b>M4.</b> Each Reliability Coordinator shall provide dated evidence <del>that it has demonstrated</del> that it has a backup control center facility (provided through its own dedicated backup facility or at another entity's control center <u>with certified Reliability Coordinator operators</u>) that provides the functionality required for maintaining compliance with all Reliability Standards <del>applicable to the Reliability Coordinator</del> <u>that depend on primary control center functionality</u> in accordance with Requirement R4.</p> <p><b>M5.</b> Each Balancing Authority and <del>applicable</del> Transmission Operator shall provide dated evidence <del>that it has demonstrated</del> <del>that it's</del> <u>its</u> backup functionality (provided either through a backup control center facility or contracted services) includes monitoring, control, logging, and alarming sufficient for maintaining</p>					

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Organization	Question 4:	Question 4 Comments:
<p>compliance with all Reliability Standards <del>applicable that depend on</del> <u>to a Balancing Authority or Transmission Operator's <a href="#">primary control center functionality</a></u> respectively in accordance with Requirement R5.</p>		
Duke Energy	No	<p>This standard uses the terms "control center", "capability", "facility" and "functionality" somewhat interchangeably. We believe the standard should consistently use the term "functionality" in the Requirements, Measures and Data Retention (see detailed comment #7 below).</p> <p>The Data Retention requirements are onerous and need further review. For example, there is no need to retain three years of old Operating Plans for backup functionality.</p>
<p><b>Response:</b> The SDT has attempted to be consistent in its use of these terms. The terms capability and functionality are used instead of facilities designated as control centers to denote that the Operating Plan does not just have to provide for an alternate physical space for control center personnel to work from, but also the provision for the functionality required of a registered entity to meet the standards, such as monitoring and control. The term functionality refers to the functions that are required to be performed by a registered entity, while capability refers to an entities ability to perform that function. So the plan needs to provide the capability for each function to be met.</p> <p>Data retention is an aspect of each standard. The intent of the SDT is to ensure that evidence and copies of the Operating Plan be retained for review by the compliance audit team since the last compliance audit, currently three years, although due to scheduling of audits, it is possible that the audit period may extend beyond 36 months. That is why the team recommends retaining data for three previous years, plus the current year.</p>		
Electric Reliability Council of Texas, Inc.	No	<p>M5: change "it's" to "its"</p> <p>M7: delete if is made part of R1</p> <p>M8: this measure and the related data retention requirement (Bullet 8) imply that testing must occur immediately on changing the Plan. Also change "such testing" to "previous testing"</p> <p>M9: change if R9 is changed Data Retention Bullet 3: this will be hard to do until the standard has been in place for several years. It may be deleted if R3 is changed or removed.</p> <p>Data Retention Bullet 6: this will be hard to do until the standard has been in place for several years.</p> <p>Data Retention Bullet 7: delete if R7 is rolled into R1</p>
<p><b>Response:</b> M5 change 'it's' to 'its'. The SDT agrees to this change.</p> <p><b>M5.</b> Each Balancing Authority and <del>applicable</del>-Transmission Operator shall provide dated evidence <del>that it has demonstrated that it's</del> <u>its</u> backup functionality (provided either through a backup control center facility or contracted services) includes monitoring, control, logging, and alarming sufficient for maintaining</p>		

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Organization	Question 4:	Question 4 Comments:
		<p>compliance with all Reliability Standards <del>applicable that depend on</del> <u>to a Balancing Authority or Transmission Operator's primary control center functionality</u> respectively in accordance with Requirement R5.</p> <p>M7 – The SDT did not roll Requirement R7 into Requirement R1 so Measure M7 remains in place. The SDT believes that Requirement R7 is a standalone requirement as Requirement R1 covers the plan and Requirement R7 the capabilities. However, Requirement R7 has been re-written to provide additional clarity as to what was the intent of the SDT.</p> <p><b>R7.</b> Each Reliability Coordinator, Balancing Authority, and <del>applicable</del>-Transmission Operator shall have <u>primary and backup capability</u>ies that <del>does</del> not depend on <del>the primary control center</del> <u>each other or any single data center</u> for any functionality required to maintain compliance with Reliability Standards <u>that depend on the primary control functionality</u>.</p> <p>M8 – The SDT can understand how that would be a possible interpretation of M8 and has made wording changes for clarity.</p> <p><b>M8.</b> Each Reliability Coordinator, Balancing Authority, and <del>applicable</del>-Transmission Operator shall provide evidence such as dated records, that it has <u>completed and documented its annual tested</u> <del>of its dated, current, in force</del> Operating Plan for backup functionality, <del>with evidence of its last issue, and that test results and lessons learned from such testing are noted and incorporated in subsequent revisions of its Operating Plan for backup functionality</del> in accordance with Requirement R8.</p> <p>M9 – The SDT did not change Requirement R9 as suggested so there is no need to change here.</p> <p>Since Requirement R7 was not rolled into Requirement R1, there is no reason to delete Data Retention 7. The SDT believes that Requirement R7 is a standalone requirement as Requirement R1 covers the plan and Requirement R7 the capabilities. However, Requirement R7 has been re-written to provide additional clarity as to what was the intent of the SDT.</p> <p><b>R7.</b> Each Reliability Coordinator, Balancing Authority, and <del>applicable</del>-Transmission Operator shall have <u>primary and backup capability</u>ies that <del>does</del> not depend on <del>the primary control center</del> <u>each other or any single data center</u> for any functionality required to maintain compliance with Reliability Standards <u>that depend on the primary control functionality</u>.</p>
MRO NERC Standards Review Subcommittee	No	<p>M1, M2, M3, M6, states that Entities shall have a "dated, current, in force Operating Plan?", The SDT is placing a measurement that is not contained in the Requirement.</p> <p>M4, M5, M7, states that Entities shall provide "dated evidence?", The SDT is placing a measurement that is not contained in the Requirement.</p>
<p><b>Response:</b> Requirement R6 contains language that requires the backup plan to be annually reviewed and approved, and update and approval for any changes to be accomplished within 60 days of changes in backup location, capability or contact information. Requirement R8 also includes the requirement for an annual test of its Operating Plan.</p> <p>The terms dated, current, and in force refer to the timing requirements stated in Requirement R6, that the Operating Plan for backup or redundant functionality be</p>		

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Organization	Question 4:	Question 4 Comments:
<p>dated to determine when it became effective, current, and in force, to denote that it is the version of the plan that is approved, and has been updated to include any changes in location, capability, or contact information. The measures in this case do not add to the requirements, but rather make the requirements clearly measurable.</p> <p>The SDT feels that 'dated evidence' is needed in the measurements of the various requirements to demonstrate for an auditor that the entity was in compliance for the period of time since the last audit. If, for instance, test results are provided with no dates as to when the test was performed, the auditors would have no way of knowing whether or not the requirement, such as R8 which requires annual testing of the Operating Plan, was met.</p>		
ITC	No	<p>Suggest replacing the words "current, in-force" with "approved" for clarity in several of the Measures. The implication of "approved" is that an auditor would be able to see a signature of approval of the Plan.</p> <p>Measure 7 evidence would not be easy to provide since you trying to prove a negative - that you don't do something. An auditor could not practically verify that the technical backup capability does not depend on the primary control center. Per comments elsewhere, the associated requirement should be removed and defer to requirement 1.</p>
<p><b>Response:</b> The term 'approved' is included to address the authority of the plan, whereas the terms 'current and in-force' have more to do with ensuring the version of the plan which is provided to operating personnel is the version of the plan which has been most recently reviewed and distributed to the intended audience.</p> <p>M7 – In this case, the SDT is not asking an entity for proof that something didn't happen. Rather, the measure is that evidence should include a review, study or report, or some other appropriate type of evidence that the backup capabilities do not share a common point of failure with the primary control center, which can be done and documented.</p>		
Western Area Power Administration	No	These measures should be consistent with other existing data retention measures that have already been approved (3 years worth of data). Suggestion is to have the current year and two previous years worth of data.
Bureau of Reclamation	No	These measures should be consistent with other existing data retention measures that have already been approved.
Xcel Energy	No	Data retention should be 3 years.
<p><b>Response:</b> Data retention is an aspect of each standard. The intent of the standards drafting team is to ensure that evidence and copies of the Operating Plan be retained for review by the compliance audit team since the last compliance audit, currently three years, although due to scheduling of audits, it is possible that the audit period may extend beyond 36 months. That is why the team recommends retaining data for three previous years, plus the current year.</p>		

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Organization	Question 4:	Question 4 Comments:
Brazos Electric Power Cooperative, Inc.	No	It seems excessive to retain each and every change to these documents and to note that they be 'an approved' plan. We think more emphasis should be placed on having the backup and demonstrating its readiness instead of worrying about documenting everything. No real suggestion for improvement other than to remove some of the unnecessary documentation burdens and language. Perhaps just delete all the lower risk items.
<p><b>Response:</b> While the purpose of the standard is to ensure that adequate backup capability exists, the Operating Plan is an integral part of verifying that backup capability. Documentation and measures that are appropriate for audit are an important part of this verification. The requirements for approval and retention are needed to ensure that adequate review and authorization are given to the Operating Plan and that the entity retains sufficient documentation to demonstrate compliance for the period covered by the audit. The SDT does not consider the retention of this data to be unnecessary.</p>		
PJM Interconnection	No	Changes need to be made to address the primary/backup language (see 7 below). Additionally, data retention requirements are far too voluminous. There should only be one version (current) in the Control Center. Requiring 3 years worth of outdated plans in the control room, accessible to the operators, may result in mis-operations.
<p><b>Response:</b> It is not the intention of the SDT that three years of outdated plans be maintained in the control room. Rather the requirement to maintain former versions of the plan is for audit purposes only. Only the current version of the plan should be provided to operating personnel for implementation.</p>		
Ameren	No	Measures 1, 2, 3, 6, and 8 require dated, current, in force Operating Plan but there is no time requirement in the associated requirements. Measures should not add to the requirements. What does current really mean? How would the compliance auditor know if the Operating Plan is current given that the requirement does not mention date or time? We suggest removing the term in force because it does not add anything to the requirement. Why would the responsible entity supply an Operating Plan to the compliance auditor that wasn't in force? Measures 1, 2, 3, 6, and 8 also state that evidence of the last issue of the Operating Plan is required. There is nothing in the associated requirements about issuing. Thus again the measures are adding to the requirements but should not. To whom is the Operating Plan required to be issued in the Measures? Part of the issue with Measure 6 is that its associated requirement really should be a sub-requirement of requirement 1. This would solve some of the issues with Measure 1. A large part of the issue with Measures 2, 3, 6, and 8 appear to be overuse of copy and paste. The only requirement associated with these measurements that really needs a dated Operating plan as evidence is requirement 1 but as the requirement is currently written it does not require the Operating Plan to have a date. Measure 7 should not include a requirement for dated evidence. What is really needed is that the Operating Plan evidence presented should have a date and the Operating Plan should be verified to not depend on the primary control center. The compliance auditors could not practically verify that the backup capability or backup control center does not depend on the primary control center. Thus, the requirement associated with Measure 7 is really a sub-requirement of requirement 1. Measurement 9 should not require the RC, BA, and TOP to have evidence that a plan has been submitted to its Regional Entity when it loses its primary control center or backup capability or backup control center because the Regional Entity is the Compliance

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Organization	Question 4:	Question 4 Comments:
		Enforcement Authority. The Regional Entity will know when the plan is received.
FirstEnergy Corp.	No	Measures 1, 2, 3, 6, and 8 require a dated Operating Plan but there is nothing in the associated requirements that states the plan shall contain an effective date. The requirements section of the standard should cover all of the expectations Measures should not add to the requirements. We believe adding a subrequirement to R1 that requires the plan have an effective date, would provide the appropriate source documents to substantiate compliance for all requirements associated with the Operating Plan. Also, with the span of time that elapses between each compliance audit, the drafting team should consider whether the measures section should include statements to retain copies of revisions to the plan for the specified retention period as evidence of compliance. The measures could be simplified by not repeating text that has already been stated, so that the main point is clearly evident. For example in Measure M2 the intent of the requirement and measure is ensure a valid copy of the Operating Plan is located at both the primary and back-up centers. Therefore it may be more concise to say: "Each Reliability Coordinator, Balancing Authority, and applicable Transmission Operator shall have evidence of a valid Operating Plan, meeting R1/M1, is in force and located at its primary and back-up operating centers. It is suggested that the SDT consider this advice/recommendation throughout all measures to improve readability so that readers can quickly understand what is needed. There should be no need to re-peat text from other requirements/measures already covered within the standard.
ISO/RTO Council	No	Measures 1, 2, 3, 6, and 8 require dated, current, in force Operating Plan but there is no time requirement in the associated requirements. Measures should not add to the requirements. What does current really mean? How would the compliance auditor know if the Operating Plan is current given that the requirement does not mention date or time? We suggest removing the term in force because it does not add anything to the requirement. Why would the responsible entity supply an Operating Plan to the compliance auditor that wasn't in force? Measures 1, 2, 3, 6, and 8 also state that evidence of the last issue of the Operating Plan is required. There is nothing in the associated requirements about issuing. Thus again the measures are adding to the requirements but should not. To whom is the Operating Plan required to be issued in the Measures? Part of the issue with Measure 6 is that its associated requirement really should be a sub-requirement of requirement 1. This would solve some of the issues with Measure 1. A large part of the issue with Measures 2, 3, 6, and 8 appear to be overuse of copy and paste. The only requirement associated with these measurements that really needs a dated Operating plan as evidence is requirement 1 but as the requirement is currently written it does not require the Operating Plan to have a date. Measure 7 should not include a requirement for dated evidence. What is really needed is that the Operating Plan evidence presented should have a date and the Operating Plan should be verified to not depend on the primary control center. The compliance auditors could not practically verify that the backup capability or backup control center does not depend on the primary control center. Thus, the requirement associated with Measure 7 is really a sub-requirement of requirement 1. Measurement 9 should not require the RC, BA, and TOP to have evidence that a plan has been submitted to its Regional Entity when it loses its primary control center or backup capability or backup control center because the Regional Entity is the Compliance Enforcement Authority. The Regional Entity will know when the plan is received.

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Organization	Question 4:	Question 4 Comments:
Midwest ISO	No	<p>Measures 1, 2, 3, 6, and 8 require dated, current, in force Operating Plan but there is no time requirement in the associated requirements. Measures should not add to the requirements. What does current really mean? How would the compliance auditor know if the Operating Plan is current given that the requirement does not mention date or time? We suggest removing the term in force because it does not add anything to the requirement. Why would the responsible entity supply an Operating Plan to the compliance auditor that wasn't in force?</p> <p>Measures 1, 2, 3, 6, and 8 also state that evidence of the last issue of the Operating Plan is required. There is nothing in the associated requirements about issuing. Thus again the measures are adding to the requirements but should not. To whom is the Operating Plan required to be issued in the Measures? Part of the issue with Measure 6 is that its associated requirement really should be a sub-requirement of requirement 1. This would solve some of the issues with Measure 1. A large part of the issue with Measures 2, 3, 6, and 8 appear to be overuse of copy and paste. The only requirement associated with these measurements that really needs a dated Operating plan as evidence is requirement 1 but as the requirement is currently written it does not require the Operating Plan to have a date.</p> <p>Measure 7 should not include a requirement for dated evidence. What is really needed is that the Operating Plan evidence presented should have a date and the Operating Plan should be verified to not depend on the primary control center. The compliance auditors could not practically verify that the backup capability or backup control center does not depend on the primary control center. Thus, the requirement associated with Measure 7 is really a sub-requirement of requirement 1.</p> <p>Measurement 9 should not require the RC, BA, and TOP to have evidence that a plan has been submitted to its Regional Entity when it loses its primary control center or backup capability or backup control center because the Regional Entity is the Compliance Enforcement Authority. The Regional Entity will know when the plan is received.</p>
<p><b>Response:</b> The SDT understands that the use of several adjectives to describe the timeliness and authorization of the Plan may seem superfluous, but believes that each of these words are needed to capture the expectation that the Operating Plan be the most recent version, with the effective date noted, with appropriate approval authority, and be the one that is currently in effect.</p> <p>R1 and R2 – The SDT has modified the requirements to add a timing factor. The other requirements already included a timing factor.</p> <p>In response to these comments, M1, M2, M3, M6, and M8 have been revised to remove the ‘evidence of issue’ wording.</p> <p><b>M1.</b> Each Reliability Coordinator, Balancing Authority, and applicable-Transmission Operator shall have a dated, current, in force Operating Plan for backup functionality in accordance with Requirement R1, in electronic or hardcopy format, <del>with evidence of its last issue, describing the manner in which it ensures reliable operations of the BES in the event that its primary control center becomes inoperable.</del></p> <p><b>M2.</b> Each Reliability Coordinator, Balancing Authority, and applicable-Transmission Operator shall have a dated, current, in force copy of its Operating Plan for backup functionality in accordance with Requirement R2, in electronic or hardcopy format, <del>with evidence of its last issue, located available in its primary control</del></p>		

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Organization	Question 4:	Question 4 Comments:
		<p>center and at the location supporting backup functionality.</p> <p><b>M3.</b> Each Reliability Coordinator, Balancing Authority, and applicable Transmission Operator directing BES operations through other entities shall provide evidence that it has ensured that backup functionality exists for the BES operations performed through those other entities <del>included provisions for the loss of such entity's control functionality in its dated, current, in force Operating Plan for backup functionality, with evidence of its last issue,</del> for backup functionality in accordance with Requirement R3.</p> <p><b>M6.</b> Each Reliability Coordinator, Balancing Authority, and applicable Transmission Operator, shall have evidence that it's dated, current, in force Operating Plan for backup functionality, in electronic or hardcopy format, <del>with evidence of its last issue,</del> has been reviewed and approved annually and that it has been updated within sixty calendar days of any changes to the <del>backup location, capabilities described in Requirement R1, or contact information</del> in accordance with Requirement R6.</p> <p><b>M8.</b> Each Reliability Coordinator, Balancing Authority, and applicable Transmission Operator shall provide evidence such as dated records, that it has completed and documented its annual <del>tested of its dated, current, in force Operating Plan for backup functionality, with evidence of its last issue, and that test results and lessons learned from such testing are noted and incorporated in subsequent revisions of its Operating Plan for backup functionality</del> in accordance with Requirement R8.</p> <p>R1 &amp; R6: The SDT does not consider the requirement and associated measure for annual review and approval, or review and approval within 60 days of changes being made to be redundant with Requirement R1 and its sub-requirements which contain the minimum set of attributes to be included in the Operating Plan for redundant or backup functionality.</p> <p>The intent of M7 is that the entity provides evidence that its backup functionality does not depend upon the primary control center for any functionality required to maintain compliance with Reliability Standards in accordance with Requirement R7.</p> <p>The intent of Requirement R9 is not to simply notify the Reliability Assurer but to provide the entity that has suffered the failure a 6 month window in which to create a plan without being in non-compliance of the basic requirements in this standard. Without Requirement R9, the entity that has suffered a loss is technically out of compliance with several other requirements in this standard.</p>
ISO New England Inc	No	We do not agree with some of the requirements (see our comments under Q7) and hence some Measures may need to be revised if the SDT agrees with any of our suggested changes to the requirements.
Independent Electricity System Operator	Yes	We do not agree with some of the requirements (see our comments under Q7) and hence some Measures may need to be revised if the SDT agrees with any of our suggested changes to the requirements.
NPCC	Yes	We do not agree with some of the requirements (see our comments under Q7) and hence some Measures may need to be

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Organization	Question 4:	Question 4 Comments:
		revised if the SDT agrees with any of our suggested changes to the requirements.
Hydro-Québec TransÉnergie (HQT)	No	We do not agree with some of the requirements (see our comments under Q7) and hence some Measures may need to be revised if the SDT agrees with any of our suggested changes to the requirements.
<b>Response:</b> See the comments provided in Question 7.		
WECC Reliability Coordinator Comment Working Group	Yes	
San Diego Gas and Electric	Yes	
ComEd / Exelon	Yes	
Entergy System Planning & Operations (Generation & Marketing)	Yes	
Manitoba Hydro	Yes	
Sierra Pacific Power Co.	Yes	

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Organization	Question 4:	Question 4 Comments:
(dba NV Energy)		
Southern Company Transmission	Yes	
Oncor Electric Delivery	Yes	
Pepco Holdings, Inc. - Affiliates	Yes	
Santee Cooper	Yes	
ReliabilityFirst Corporation	Yes	
Bonneville Power Administration	Yes	
AEP	Yes	
Northeast Utilities	Yes	
<b>Response:</b> Thank you for your response.		

**5. The SDT has included compliance elements including VSLs for this posting. Do you agree with the assignments that have been made? If not, please provide specific suggestions for change.**

**Summary Consideration:**

Numerous comments were received from industry on the VSLs. The SDT reviewed these comments, some of which disagreed with each other, and has made corresponding changes in the VSLs for EOP-008-1. The following changes have been made due to industry comments:

**R1** Each Reliability Coordinator, Balancing Authority, and ~~applicable~~-Transmission Operator shall have an current Operating Plan describing the manner in which it ensures reliable operations of the BES in the event that its primary control center becomes inoperable. This Operating Plan for backup functionality shall include the following at a minimum:

**R1.5** A transition period between the loss of primary control center functionality and the time to fully implement the backup functionality that is less than or equal to ~~plan and get backup functionality up and running that is less than~~ two hours.

**R2** Each Reliability Coordinator, Balancing Authority, and ~~applicable~~-Transmission Operator shall have a copy of its current Operating Plan for backup functionality ~~located available in~~ at its primary control center and at the location supporting backup functionality.

**M1.** Each Reliability Coordinator, Balancing Authority, and ~~applicable~~-Transmission Operator shall have a dated, current, in force Operating Plan for backup functionality in accordance with Requirement R1, in electronic or hardcopy format, ~~with evidence of its last issue, describing the manner in which it ensures reliable operations of the BES in the event that its primary control center becomes inoperable.~~

**M2** Each Reliability Coordinator, Balancing Authority, and ~~applicable~~-Transmission Operator shall have a dated, current, in force copy of its Operating Plan for backup functionality in accordance with Requirement R2, in electronic or hardcopy format, ~~with evidence of its last issue, located available in~~ at its primary control center and at the location supporting backup functionality.

**M8.** Each Reliability Coordinator, Balancing Authority, and ~~applicable~~-Transmission Operator shall provide evidence such as dated records, that it has completed and documented its annual ~~tested of~~ its ~~dated, current, in force~~-Operating Plan for backup functionality, ~~with evidence of its last issue, and that test results and lessons learned from such testing are noted and incorporated in subsequent revisions of its Operating Plan for backup functionality~~ in accordance with Requirement R8.

**R1 VSL**

<b>R1</b>	The Reliability Coordinator, Balancing Authority, or <del>applicable</del> -Transmission Operator has an <u>current</u> Operating Plan for backup functionality but the plan is missing one of the sub-	The Reliability Coordinator, Balancing Authority, or <del>applicable</del> -Transmission Operator has an <u>current</u> Operating Plan for backup functionality but the plan is missing two of the sub-	The Reliability Coordinator, Balancing Authority, or <del>applicable</del> -Transmission Operator has an <u>current</u> Operating Plan for backup functionality but the plan is missing three or more of	The Reliability Coordinator, Balancing Authority, or <del>applicable</del> -Transmission Operator does not have an <u>current</u> Operating Plan for backup functionality.
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	requirements or the plan <del>is</del> <u>does not dated with evidence reflect the date</u> of its last <del>issue</del> <u>issuance</u> .	requirements.	the sub-requirements <u>or is not compliant with Requirement R1.5</u> .	
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R2 VSL

R2	The Reliability Coordinator, Balancing Authority, or <del>applicable</del> Transmission Operator has an Operating Plan for backup functionality <del>but the plan is not located available in at one</del> <u>all</u> of its control locations <del>but at one location it is not the current plan</del> .	The Reliability Coordinator, Balancing Authority, or <del>applicable</del> Transmission Operator has an Operating Plan for backup functionality <del>but the plan is not located available in at either all</del> <u>all</u> of its control locations <del>but at all locations it is not the current plan</del> .	N/A	<del>N/A</del> <u>The Reliability Coordinator, Balancing Authority, or Transmission Operator has an Operating Plan for backup functionality but no version of the plan is available at all of its control locations.</u>
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R3 VSL

R3	The <u>Reliability Coordinator, Balancing Authority, or applicable</u> Transmission Operator directing BES operations through other entities has not <u>ensured against included provisions for</u> the loss of such entity's control functionality <u>that is depended upon for compliance with one or more Requirements in the Reliability Standards having a Lower VRF for</u> <del>10% or less of its</del>	The <u>Reliability Coordinator, Balancing Authority, or applicable</u> Transmission Operator directing BES operations through other entities has not <u>ensured against included provisions for</u> the loss of such entity's control functionality <u>that is depended upon for compliance with one or more Requirements in the Reliability Standards having a Medium VRF for</u> <del>more than 10% and less</del>	The <u>Reliability Coordinator, Balancing Authority, or applicable</u> Transmission Operator directing BES operations through other entities has not <u>ensured against included provisions for</u> the loss of such entity's control functionality <u>that is depended upon for compliance with one or more Requirements in the Reliability Standards having a High VRF for</u> <del>more than 25% of its</del>	The <u>Reliability Coordinator, Balancing Authority, or applicable</u> Transmission Operator directing BES operations through other entities has not <u>ensured against included provisions for</u> the loss of any such entity's control functionality in its Operating Plan for backup functionality.
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	<del>applicable entities</del> in its Operating Plan for backup functionality.	<del>than 25% of its applicable entities</del> in its Operating Plan for backup functionality.	<del>applicable entities</del> in its Operating Plan for backup functionality.	
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R4 VSL

R4	The Reliability Coordinator has demonstrated that it has a backup control center facility (provided through its own dedicated backup facility or at another entity’s control center <u>with certified Reliability Coordinator operators</u> ) in accordance with <del>†</del> Requirement R4 but it <del>only provides</del> <u>does not provide</u> the functionality required for maintaining compliance with <del>90%</del> <u>one or more</u> of the <u>Requirements in the Reliability Standards applicable to the Reliability Coordinator that depend on the primary control center functionality and which have a Lower VRF.</u> <del>† or the evidence of the demonstration is not dated.</del>	The Reliability Coordinator has demonstrated that it has a backup control center facility (provided through its own dedicated backup facility or at another entity’s control center <u>with certified Reliability Coordinator operators</u> ) in accordance with <del>†</del> Requirement R4 but it <del>only provides</del> <u>does not provide</u> the functionality required for maintaining compliance with <del>80%</del> <u>one or more</u> of the <u>Requirements in the Reliability Standards applicable to the Reliability Coordinator that depend on the primary control center functionality and which have a Medium VRF.</u>	The Reliability Coordinator has demonstrated that it has a backup control center facility (provided through its own dedicated backup facility or at another entity’s control center <u>with certified Reliability Coordinator operators</u> ) in accordance with <del>†</del> Requirement R4 but it <del>only provides</del> <u>does not provide</u> the functionality required for maintaining compliance with <del>70%</del> <u>one or more</u> of the <u>Requirements in the Reliability Standards applicable to the Reliability Coordinator that depend on the primary control center functionality and which have a High VRF.</u>	The Reliability Coordinator has not demonstrated that it has a backup control center facility (provided through its own dedicated backup facility or at another entity’s control center <u>with certified Reliability Coordinator operators</u> ) in accordance with <del>†</del> Requirement R4.
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R5 VSL

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R5	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with <del>R</del>Requirement R5 but it <del>only includes</del><u>does not include</u> monitoring, control, logging, and alarming sufficient for maintaining compliance with <del>90%</del><u>one or more</u> of the <u>Requirements in the Reliability Standards applicable to a Balancing Authority and Transmission Operator respectively that depend on the primary control center functionality and which have a Lower VRF.</u> <del>or its evidence is not dated.</del></p>	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with <del>R</del>Requirement R5 but it <del>only includes</del><u>does not include</u> monitoring, control, logging, and alarming sufficient for maintaining compliance with <del>80%</del><u>one or more</u> of the <u>Requirements in the Reliability Standards applicable to a Balancing Authority and Transmission Operator respectively that depend on the primary control center functionality and which have a Medium VRF.</u></p>	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with <del>R</del>Requirement R5 but it <del>only includes</del><u>does not include</u> monitoring, control, logging, and alarming sufficient for maintaining compliance with <del>70%</del><u>one or more</u> of the <u>Requirements in the Reliability Standards applicable to a Balancing Authority and Transmission Operator respectively that depend on the primary control center functionality and which have a High VRF.</u></p>	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has not demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with <del>R</del>Requirement R5.</p>
R6 VSL				
R6	<p>The Reliability Coordinator, Balancing Authority, or <del>applicable</del> Transmission Operator, has evidence that it's dated, current, in force Operating Plan for</p>	<p><del>The Reliability Coordinator, Balancing Authority, or applicable Transmission Operator, has evidence that it's dated, current, in force Operating Plan for</del></p>	<p><del>N/A The Reliability Coordinator, Balancing Authority, or Transmission Operator, has evidence that it's dated, current, in force Operating Plan for</del></p>	<p><del>N/A The Reliability Coordinator, Balancing Authority, or Transmission Operator, does not have evidence that it's dated, current, in force Operating</del></p>

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	<p>backup functionality, <del>with evidence of its last issue,</del> was reviewed and approved but it was <u>not</u> done in <u>one calendar year more than twelve calendar months and less than or equal to fifteen calendar months</u> or that it was updated more than sixty calendar days and less than or equal to ninety calendar days after any changes <del>to the backup location,</del> capabilities <u>described in Requirement R1,</u> or contact information.</p>	<p><del>backup functionality, with evidence of its last issue, was reviewed and approved but it was not done in more than two calendar years fifteen calendar months or that it was updated more than ninety calendar days after any changes to the backup location, capabilities, or contact information. N/A</del></p>	<p><u>backup functionality, with evidence of its last issue, was reviewed and approved but it was not done in two calendar years or more or that it was updated more than ninety calendar days after any changes to the capabilities described in Requirement R1.</u></p>	<p><u>Plan for backup functionality was reviewed and approved.</u></p>
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R7 VSL

R7	N/A	N/A	N/A	<p>The Reliability Coordinator, Balancing Authority, or <del>applicable</del> Transmission Operator's <del>dated</del> evidence <del>does not demonstrate</del> <u>shows</u> that its <u>primary and</u> backup capability <del>ies</del> <u>does not</u> depend on <u>each other or any common facility the primary control center</u> for the functionality required to maintain compliance with Reliability Standards <u>that depend on the primary control functionality.</u></p>
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R8 VSL

<p>R8</p>	<p>The Reliability Coordinator, Balancing Authority, or <del>applicable</del>-Transmission Operator <del>has provided evidence, such as dated records, that it has</del> <u>annually</u> tested its <del>_dated, current, in force</del>-Operating Plan for backup functionality, <del>but one of the following occurred: 1) the demonstration was with evidence of its last issue, through actual implementation or test operations</del> for less than two continuous hours, <del>2) or it has failed to demonstrate that the transition time period is less than or equal to two hours, or it was done in more than twelve calendar months or 3) 3) test results and lessons learned were not incorporated</del> <u>documented in subsequent revisions of the Operating Plan for backup functionality.</u></p>	<p><u>The Reliability Coordinator, Balancing Authority, or Transmission Operator has annually tested its Operating Plan for backup functionality, but two of the following occurred: 1) the demonstration was for less than two continuous hours, 2) it has failed to demonstrate that the transition time period is less than or equal to two hours, or 3) test results were not documented.</u> <del>N/A</del></p>	<p><u>The Reliability Coordinator, Balancing Authority, or Transmission Operator has annually tested its Operating Plan for backup functionality, but all three of the following occurred: 1) the demonstration was for less than two continuous hours, 2) it has failed to demonstrate that the transition time period is less than or equal to two hours, and 3) test results were not documented.</u> <del>N/A</del></p>	<p>The Reliability Coordinator, Balancing Authority, or <del>applicable</del>-Transmission Operator has not annually tested its <del>dated, current, in force</del>-Operating Plan for backup functionality.</p>
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Organization	Question 5:	Question 5 Comments:			
Puget Sound Energy	No	R.3 Since the terms of this requirement and measure are not clearly defined, there is no clear way to determine what percentage was met.  R.5 What mechanism will be used to determine the percentage of standards can be or could be met?			
<p><b>Response:</b> The BFSDT agrees and has modified Requirements R3 and R5 VSL to better address the intent of the SDT and to remove the reliance on a percentage calculation.</p>					
<p><b>R3 VSL</b></p>					
R3		<p>The <u>Reliability Coordinator, Balancing Authority, or applicable</u> Transmission Operator directing BES operations through other entities has not <u>ensured against</u> <del>included provisions for</del> the loss of such entity's control functionality <u>that is depended upon for compliance with one or more</u> Requirements in the Reliability Standards having a Lower VRF <del>for 10% or less of its applicable entities</del> in its Operating Plan for backup functionality.</p>	<p>The <u>Reliability Coordinator, Balancing Authority, or applicable</u> Transmission Operator directing BES operations through other entities has not <u>ensured against</u> <del>included provisions for</del> the loss of such entity's control functionality <u>that is depended upon for compliance with one or more</u> Requirements in the Reliability Standards having a Medium VRF <del>for more than 10% and less than 25% of its applicable entities</del> in its Operating Plan for backup functionality.</p>	<p>The <u>Reliability Coordinator, Balancing Authority, or applicable</u> Transmission Operator directing BES operations through other entities has not <u>ensured against</u> <del>included provisions for</del> the loss of such entity's control functionality <u>that is depended upon for compliance with one or more</u> Requirements in the Reliability Standards having a High VRF <del>for more than 25% of its applicable entities</del> in its Operating Plan for backup functionality.</p>	<p>The <u>Reliability Coordinator, Balancing Authority, or applicable</u> Transmission Operator directing BES operations through other entities has not <u>ensured against</u> <del>included provisions for</del> the loss of any such entity's control functionality in its Operating Plan for backup functionality.</p>
<p><b>R5 VSL</b></p>					

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Organization	Question 5:	Question 5 Comments:				
R5		<p>The Balancing Authority or <del>applicable</del> Transmission Operator has demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with <del>Requirement R5</del> but it <del>only includes</del> <u>does not include</u> monitoring, control, logging, and alarming sufficient for maintaining compliance with <del>90%</del> <u>one or more of the Requirements in the Reliability Standards applicable to a Balancing Authority and Transmission Operator respectively that depend on the primary control center functionality and which have a Lower VRF.</u> <del>of its evidence is not dated.</del></p>	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with <del>Requirement R5</del> but it <del>only includes</del> <u>does not include</u> monitoring, control, logging, and alarming sufficient for maintaining compliance with <del>80%</del> <u>one or more of the Requirements in the Reliability Standards applicable to a Balancing Authority and Transmission Operator respectively that depend on the primary control center functionality and which have a Medium VRF.</u></p>	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with <del>Requirement R5</del> but it <del>only includes</del> <u>does not include</u> monitoring, control, logging, and alarming sufficient for maintaining compliance with <del>70%</del> <u>one or more of the Requirements in the Reliability Standards applicable to a Balancing Authority and Transmission Operator respectively that depend on the primary control center functionality and which have a High VRF.</u></p>	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has not demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with <del>Requirement R5</del>.</p>	
San Diego Gas and	No	We would like to see additional consistency used between the Requirements verbiage and the Violation Severity Level table verbiage, particularly with respect to R8 (although this same terminology appears elsewhere as well). The Requirements				

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Organization	Question 5:	Question 5 Comments:
Electric		<p>verbiage for R8 uses the term "annual" in the description when referring to testing, whereas the VSL table refers to a period of "12 calendar months." In discussing the terminology with others, there seems to be a difference of opinion of the definition of the word "annual" when it comes to NERC compliance. Some people think that the particular requirement can be fulfilled anytime within a particular calendar year (one year in July and the following year in September and the following year in May, etc.), whereas others believe that an August 1 test date in one year means that the same testing must be completed before August 1 in the following year to remain in compliance. The issue with the latter interpretation of "annual" is that the requirement will suffer from date creep every year, as the entity completes the compliance requirement in advance of the prior year. Over time, this date creep will ultimately cause entities to have to perform testing and other requirements at times of the year when we don't want to do them (i.e. summer periods) or do them too far in advance. We believe the requirement should be spelled out specifically so the definition is crystal clear (i.e., every 11 months plus or minus 30 days).</p>

**Response:** The SDT agrees and has clarified the language in the VSL for Requirement R8 to make it consistent with the requirement that the test is an annual test that is conducted at any time in a calendar year.

**R8 VSL**

R8		<p>The Reliability Coordinator, Balancing Authority, or applicable Transmission Operator <del>has provided evidence, such as dated records, that it has annually tested its <u>dated, current, in force</u> Operating Plan for backup functionality, but one of the following occurred: 1) the demonstration was <del>with evidence of its last issue, through actual implementation or test operations</del> for less than two continuous hours,</del></p>	<p><u>The Reliability Coordinator, Balancing Authority, or Transmission Operator has annually tested its Operating Plan for backup functionality, but two of the following occurred: 1) the <del>test</del> demonstration was <del>through actual implementation or test operations</del> for less than two continuous hours, 2) it has failed to demonstrate that the transition time period is less than or equal to two hours, or 3) test</u></p>	<p><u>The Reliability Coordinator, Balancing Authority, or Transmission Operator has annually tested its Operating Plan for backup functionality, but all three of the following occurred: 1) the demonstration was for less than two continuous hours, 2) it has failed to demonstrate that the transition time period is less than or equal to two hours, and 3) test results were not <del>incorporated</del></u></p>	<p>The Reliability Coordinator, Balancing Authority, or <del>applicable</del> Transmission Operator has not annually tested its <del>dated, current, in force</del> Operating Plan for backup functionality.</p>
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Organization	Question 5:	Question 5 Comments:				
		<p><del>2) or it has failed to demonstrate that the transition time period is less than or equal to two hours, or it was done in more than twelve calendar months or 3) test results and lessons learned were not incorporated documented in subsequent revisions of the Operating Plan for backup functionality.</del></p>	<p><del>results were not documented. N/A</del></p>	<p><del>documented. N/A</del></p>		
Sierra Pacific Power Co. (dba NV Energy)	No	<p>In R2 Lower, we recommend that the VSL language be amended to strike "located in one of its control locations" and replace with "available to Operators at one of either the primary or backup control centers" and in R2 Moderate, amend to remove "located in either of its control locations" and replace with "available to Operators at any of its control locations".</p> <p>In R5, it appears that the degree of severity will be nearly impossible to determine. The VSL language calls for a determination of exactly what percentage of the Reliability Standards can be complied with from the backup center. While we don't have a specific suggestion, we believe that the Auditors will have a very difficult time making a determination with the VSL's as written.</p> <p>In R7, there is only one VSL and it is "severe". The degree of violation here must depend upon the level of dependency that the backup functionality has upon the primary control center and the number and relative importance of the functions for which that dependency exists. We respectfully disagree with the exclusion of Lower, Moderate and High VSL's and the classification of any violation as being "severe" for this Requirement.</p>				
<p><b>Response:</b> R2: It is the intent of the SDT to allow electronic or hardcopy of the plan to meet Requirement R2 and it has modified Measure M2 and the R2 VSL accordingly. The SDT also agrees with the notion of the plan being 'available at' rather than 'located at' in order to be consistent with the change to accommodate electronic access and has modified Requirement R2 VSL accordingly</p> <p><b>R2</b> Each Reliability Coordinator, Balancing Authority, and <del>applicable</del> Transmission Operator shall have a copy of its <u>current</u> Operating Plan for backup</p>						

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Organization	Question 5:	Question 5 Comments:			
<p>functionality <del>located available in</del> at its primary control center and at the location supporting backup functionality.</p>					
<p><b>M2</b> Each Reliability Coordinator, Balancing Authority, and <del>applicable</del> Transmission Operator shall have a dated, current, in force copy of its Operating Plan for backup functionality in accordance with Requirement R2, in electronic or hardcopy format, <del>with evidence of its last issue, located available in</del> at its primary control center and at the location supporting backup functionality.</p>					
<p><b>R2 VSL</b></p>					
<p><b>R2</b></p>		<p>The Reliability Coordinator, Balancing Authority, or <del>applicable</del> Transmission Operator has an Operating Plan for backup functionality <del>but the plan is not located available in at</del> <u>one</u> all of its control locations <u>but at one location it is not the current plan.</u></p>	<p>The Reliability Coordinator, Balancing Authority, or <del>applicable</del> Transmission Operator has an Operating Plan for backup functionality <del>but the plan is not located available in at</del> <u>either</u> all of its control locations <u>but at all locations it is not the current plan.</u></p>	<p>N/A</p>	<p><del>N/A</del> <u>The Reliability Coordinator, Balancing Authority, or Transmission Operator has an Operating Plan for backup functionality but no version of the plan is available at all of its control locations.</u></p>
<p>R5: The SDT agrees and has modified the VSL for R5 accordingly.</p>					
<p><b>R5 VSL</b></p>					
<p><b>R5</b></p>	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with</p>	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with</p>	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with</p>	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has not demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with</p>	

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Organization	Question 5:	Question 5 Comments:			
		<p><del>Requirement R5 but it only includes</del> <u>does not include</u> monitoring, control, logging, and alarming sufficient for maintaining compliance with <del>90%</del> <u>one or more of the Requirements in the Reliability Standards applicable to a Balancing Authority and Transmission Operator respectively that depend on the primary control center functionality and which have a Lower VRF.</u> <del>of its evidence is not dated.</del></p>	<p><del>Requirement R5 but it only includes</del> <u>does not include</u> monitoring, control, logging, and alarming sufficient for maintaining compliance with <del>80%</del> <u>one or more of the Requirements in the Reliability Standards applicable to a Balancing Authority and Transmission Operator respectively that depend on the primary control center functionality and which have a Medium VRF.</u></p>	<p><del>Requirement R5 but it only includes</del> <u>does not include</u> monitoring, control, logging, and alarming sufficient for maintaining compliance with <del>70%</del> <u>one or more of the Requirements in the Reliability Standards applicable to a Balancing Authority and Transmission Operator respectively that depend on the primary control center functionality and which have a High VRF.</u></p>	<p><del>Requirement R5.</del></p>
<p>R7: The SDT discussed this issue extensively and determined that there is not any definable level of dependence between the primary and backup control functionality that would have a lower severity level, and as such did not define Lower, Moderate or High VSL for Requirement R7. The SDT did change the wording of the VSL in an attempt to provide clarity.</p> <p><b>R7 VSL</b></p>					
R7	N/A	N/A	N/A	N/A	<p>The Reliability Coordinator, Balancing Authority, or <del>applicable</del> Transmission Operator's <del>dated</del> evidence <u>does not demonstrate</u> <del>shows</del> that its <u>primary and backup</u></p>

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Organization	Question 5:	Question 5 Comments:				
					<p>capabilities <del>does not</del> depend on <u>each other</u> or <u>any common facility</u> <del>the primary control center</del> for the functionality required to maintain compliance with Reliability Standards <u>that depend on the primary control functionality</u>.</p>	
Progress Energy Carolinas, Inc.	No	Reference section D.2 Violation Severity Levels R5 -- there are specific percentages stated therein, how are they calculated? Is it per standard or per individual requirement and sub-requirements?				
Progress Energy-Florida	No	Reference section D.2 Violation Severity Levels R5 — there are specific percentages stated therein, how are they calculated? Is it per standard or per individual requirement and sub-requirements?				
<p><b>Response:</b> The SDT agrees and has modified the VSL accordingly.</p>						
<p><b>R5 VSL</b></p>						
R5	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with <del>Requirement R5</del> but it</p>	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with <del>Requirement R5</del> but it</p>	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with <del>Requirement R5</del> but it</p>	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has not demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with</p>		

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Organization	Question 5:	Question 5 Comments:				
		<p><del>only includes</del> <del>does not include</del> monitoring, control, logging, and alarming sufficient for maintaining compliance with <del>90%</del> <u>one or more of the Requirements in the Reliability Standards applicable to a Balancing Authority and Transmission Operator respectively that depend on the primary control center functionality and which have a Lower VRF.</u> <del>of its evidence is not dated.</del></p>	<p><del>only includes</del> <del>does not include</del> monitoring, control, logging, and alarming sufficient for maintaining compliance with <del>80%</del> <u>one or more of the Requirements in the Reliability Standards applicable to a Balancing Authority and Transmission Operator respectively that depend on the primary control center functionality and which have a Medium VRF.</u></p>	<p><del>only includes</del> <del>does not include</del> monitoring, control, logging, and alarming sufficient for maintaining compliance with <del>70%</del> <u>one or more of the Requirements in the Reliability Standards applicable to a Balancing Authority and Transmission Operator respectively that depend on the primary control center functionality and which have a High VRF.</u></p>	<p><del>r</del>Requirement R5.</p>	
NPCC	No	<p>R2: It requires a copy of the plan be provided at both the primary and backup facilities. Failing to provide any copy at all is a complete violation of the requirement and hence should be assigned a Severe VSL, not Medium (note that VSL is a measure of the extent to which a requirement is not met, not its impact). We therefore suggest to move the two conditions from Low/Medium to High/Severe in accordance with established VSL guidelines.</p> <p>R4: The Severe level should include a condition that the RC provides less than 70% of the functionality required for maintaining compliance with the Reliability Standards applicable to an RC. Otherwise, there will not be any VSL for RC providing functionality sufficient for maintaining compliance with, say, 40% of the Reliability Standards. Further, the proposed wording change, i.e., &lt;70%, covers the condition of not having any functionality at all to comply with reliability standards.</p> <p>R5: Same comment as in (ii) except the entities are the BAs and applicable TOPs.</p> <p>R6: There are no VSLs assigned to High and Severe. We suggest the SDT to provide the conditions that an entity fails to meet the bulk of the intent of this requirement (High) and fails to meet this requirement completely (Severe). For example, a High VSL can be assigned if the entity did not review and if necessary update its plan after 18 months, or 120 calendar days after changes were made to the backup capability; a Severe for failing to review and if necessary update its</p>				

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Organization	Question 5:	Question 5 Comments:
		plan for a longer time period or not at all.
ISO New England Inc	No	<p>R2: It requires a copy of the plan be provided at both the primary and backup facilities. Failing to provide any copy at all is a complete violation of the requirement and hence should be assigned a Severe VSL, not Medium (note that VSL is a measure of the extent to which a requirement is not met, not its impact). We therefore suggest to move the two conditions from Low/Medium to High/Severe in accordance with established VSL guidelines.</p> <p>R4: The Severe level should include a condition that the RC provides less than 70% of the functionality required for maintaining compliance with the Reliability Standards applicable to an RC. Otherwise, there will not be any VSL for RC providing functionality sufficient for maintaining compliance with, say, 40% of the Reliability Standards. Further, the proposed wording change, i.e., &lt;70%, covers the condition of not having any functionality at all to comply with reliability standards.</p> <p>R5: Same comment as in (ii) except the entities are the BAs and applicable TOPs.</p> <p>R6: There are no VSLs assigned to High and Severe. We suggest the SDT to provide the conditions that an entity fails to meet the bulk of the intent of this requirement (High) and fails to meet this requirement completely (Severe). For example, a High VSL can be assigned if the entity did not review and if necessary update its plan after 18 months, or 120 calendar days after changes were made to the backup capability; a Severe for failing to review and if necessary update its plan for a longer time period or not at all.</p>
Independent Electricity System Operator	No	<p>R2: It requires a copy of the plan be provided at both the primary and backup facilities. Failing to provide any copy at all is a complete violation of the requirement and hence should be assigned a Severe VSL, not Medium (note that VSL is a measure of the extent to which a requirement is not met, not its impact). We therefore suggest to move the two conditions from Low/Medium to High/Severe in accordance with established VSL guideline.</p> <p>R4: The Severe level should include a condition that the RC provides less than 70% of the functionality required for maintaining compliance with the Reliability Standards applicable to an RC. Otherwise, there will not be any VSL for RC providing functionality sufficient for maintaining compliance with, say, 40% of the Reliability Standards. Further, the proposed wording change, i.e., &lt;70%, covers the condition of not having any functionality at all to comply with reliability standards.</p> <p>R5: Same comment as in (ii) except the entities are the BAs and applicable TOPs.</p> <p>R6: There are no VSLs assigned to High and Severe. We suggest the SDT to provide the conditions that an entity fails to meet the bulk of the intent of this requirement (High) and fails to meet this requirement completely (Severe). For example, a High VSL can be assigned if the entity did not update its plan after 18 months or 120 calendar days after changes were made to the backup capability; a Severe VSL may be assigned for failing to update its plan for a longer time period or at all.</p>

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Organization	Question 5:	Question 5 Comments:			
Hydro-Québec TransÉnergie (HQT)	No	<p>R2: It requires a copy of the plan be provided at both the primary and backup facilities. Failing to provide any copy at all is a complete violation of the requirement and hence should be assigned a Severe VSL, not Medium (note that VSL is a measure of the extent to which a requirement is not met, not its impact). We therefore suggest to move the two conditions from Low/Medium to High/Severe in accordance with established VSL guidelines.</p> <p>R4: The Severe level should include a condition that the RC provides less than 70% of the functionality required for maintaining compliance with the Reliability Standards applicable to an RC. Otherwise, there will not be any VSL for RC providing functionality sufficient for maintaining compliance with, say, 40% of the Reliability Standards. Further, the proposed wording change, i.e., &lt;70%, covers the condition of not having any functionality at all to comply with reliability standards.</p> <p>R5: Same comment as in (ii) except the entities are the BAs and applicable TOPs.</p> <p>R6: There are no VSLs assigned to High and Severe. We suggest the SDT to provide the conditions that an entity fails to meet the bulk of the intent of this requirement (High) and fails to meet this requirement completely (Severe). For example, a High VSL can be assigned if the entity did not review and if necessary update its plan after 18 months, or 120 calendar days after changes were made to the backup capability; a Severe for failing to review and if necessary update its plan for a longer time period or not at all.</p>			
<p><b>Response:</b> R2: It is the intent of the SDT to allow electronic or hardcopy of the plan to meet Requirement R2 and it has modified Measure M2 and the R2 VSL accordingly. The SDT also agrees with the notion of the plan being 'available at' rather than 'located at' in order to be consistent with the change to accommodate electronic access and has modified Requirement R2 VSL accordingly</p> <p><b>R2</b> Each Reliability Coordinator, Balancing Authority, and <del>applicable</del>-Transmission Operator shall have a copy of its <u>current</u> Operating Plan for backup functionality <del>located available in</del> at its primary control center and at the location supporting backup functionality.</p> <p><b>M2</b> Each Reliability Coordinator, Balancing Authority, and <del>applicable</del>-Transmission Operator shall have a dated, current, in force copy of its Operating Plan for backup functionality in accordance with Requirement R2, in electronic or hardcopy format, <del>with evidence of its last issue, located available in</del> at its primary control center and at the location supporting backup functionality.</p> <p><b>R2 VSL</b></p>					
R2		The Reliability Coordinator, Balancing Authority, or <del>applicable</del> Transmission Operator has an Operating Plan for backup functionality	The Reliability Coordinator, Balancing Authority, or <del>applicable</del> Transmission Operator has an Operating Plan for backup functionality	N/A	<del>N/A</del> <u>The Reliability Coordinator, Balancing Authority, or Transmission Operator has an Operating Plan for backup functionality</u>

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Organization	Question 5:	Question 5 Comments:			
		<p><del>but the plan is not located available in-at one</del> all of its control locations <u>but at one location it is not the current plan.</u></p>	<p><del>but the plan is not located available in-at either</del> all of its control locations <u>but at all locations it is not the current plan.</u></p>		<p><u>but no version of the plan is available at all of its control locations.</u></p>
<p>R4/R5: The SDT agrees and has modified the VSL for Requirements R4 and R5 to remove reliance on percentages.</p>					
<p><b>R4 VSL</b></p>					
<p><b>R4</b></p>		<p>The Reliability Coordinator has demonstrated that it has a backup control center facility (provided through its own dedicated backup facility or at another entity's control center <u>with certified Reliability Coordinator operators</u>) in accordance with <del>Requirement R4 but it only provides</del> does not provide the functionality required for maintaining compliance with <del>90%</del> one or more of the Requirements in the Reliability Standards applicable to the Reliability Coordinator that depend on the</p>	<p>The Reliability Coordinator has demonstrated that it has a backup control center facility (provided through its own dedicated backup facility or at another entity's control center <u>with certified Reliability Coordinator operators</u>) in accordance with <del>Requirement R4 but it only provides</del> does not provide the functionality required for maintaining compliance with <del>80%</del> one or more of the Requirements in the Reliability Standards applicable to the Reliability Coordinator that depend on the</p>	<p>The Reliability Coordinator has demonstrated that it has a backup control center facility (provided through its own dedicated backup facility or at another entity's control center <u>with certified Reliability Coordinator operators</u>) in accordance with <del>Requirement R4 but it only provides</del> does not provide the functionality required for maintaining compliance with <del>70%</del> one or more of the Requirements in the Reliability Standards applicable to the Reliability Coordinator that depend on the</p>	<p>The Reliability Coordinator has not demonstrated that it has a backup control center facility (provided through its own dedicated backup facility or at another entity's control center <u>with certified Reliability Coordinator operators</u>) in accordance with <del>Requirement R4.</del></p>

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Organization	Question 5:	Question 5 Comments:			
		<p><u>primary control center functionality and which have a Lower VRF.</u> <del>of the evidence of the demonstration is not dated</del></p>	<p><u>primary control center functionality and which have a Medium VRF.</u></p>	<p><u>primary control center functionality and which have a High VRF.</u></p>	
<b>R5 VSL</b>					
<b>R5</b>		<p>The Balancing Authority or <del>applicable</del> Transmission Operator has demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with <del>Requirement R5</del> but it <del>only includes</del> <u>does not include</u> monitoring, control, logging, and alarming sufficient for maintaining compliance with <del>90%</del> <u>one or more of the Requirements in the Reliability Standards applicable to a Balancing Authority and Transmission Operator respectively that depend on the</u></p>	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with <del>Requirement R5</del> but it <del>only includes</del> <u>does not include</u> monitoring, control, logging, and alarming sufficient for maintaining compliance with <del>80%</del> <u>one or more of the Requirements in the Reliability Standards applicable to a Balancing Authority and Transmission Operator respectively that depend on the</u></p>	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with <del>Requirement R5</del> but it <del>only includes</del> <u>does not include</u> monitoring, control, logging, and alarming sufficient for maintaining compliance with <del>70%</del> <u>one or more of the Requirements in the Reliability Standards applicable to a Balancing Authority and Transmission Operator respectively that depend on the</u></p>	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has not demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with <del>Requirement R5</del>.</p>

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Organization	Question 5:	Question 5 Comments:			
		<p><u>primary control center functionality and which have a Lower VRF.</u> <del>of its evidence is not dated.</del></p>	<p><u>primary control center functionality and which have a Medium VRF.</u></p>	<p><u>primary control center functionality and which have a High VRF.</u></p>	
<p>R6: The SDT agrees and has made changes accordingly. The VSL content for Requirement R6 was changed in response to other comments received however.</p>					
<p><b>R6 VSL</b></p>					
<p>R6</p>		<p>The Reliability Coordinator, Balancing Authority, or applicable Transmission Operator, has evidence that it's dated, current, in force Operating Plan for backup functionality, <del>with evidence of its last issue,</del> was reviewed and approved but it was <u>not done in one calendar year more than twelve calendar months and less than or equal to fifteen calendar months</u> or that it was updated more than sixty calendar days and less than or equal to ninety calendar days after any changes <del>to the backup</del></p>	<p><del>The Reliability Coordinator, Balancing Authority, or applicable Transmission Operator, has evidence that it's dated, current, in force Operating Plan for backup functionality, with evidence of its last issue, was reviewed and approved but it was not done in more than two calendar years fifteen calendar months or that it was updated more than ninety calendar days after any changes to the backup location, capabilities, or contact information. N/A</del></p>	<p><del>N/A</del> <u>The Reliability Coordinator, Balancing Authority, or applicable Transmission Operator, has evidence that it's dated, current, in force Operating Plan for backup functionality, with evidence of its last issue, was reviewed and approved but it was not done in two calendar years or more or that it was updated more than ninety calendar days after any changes to the capabilities described in Requirement R1.</u></p>	<p><del>N/A</del> <u>The Reliability Coordinator, Balancing Authority, or Transmission Operator, does not have evidence that it's dated, current, in force Operating Plan for backup functionality was reviewed and approved.</u></p>

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Organization	Question 5:	Question 5 Comments:				
		<p><del>location, capabilities described in Requirement R1, or contact information.</del></p>				
Southern Company Transmission	No	<p>**For Requirement 5, a cursory review of the applicable BA and TOP standards left uncertainty as to whether some standards pertain to monitoring, control, logging, or alarming actions within the requirements. For example, BAL-005 states that the TOP must be included with the metered boundaries of a BA Area. NERC standard COM-001 states the TOP shall provide adequate and reliable telecommunications facilities. Unless there is a definite and an agreeable number of standards applicable to the TOP and BA pertaining to monitoring, control, etc., it is difficult to determine whether you exceed the 70/80/90% thresholds associated with Lower, Moderate, or High VSLs. Until there is a predetermined number of applicable standards that can be used as a benchmark for determining the correct level of VSL, it is recommended that only the Severe VSL be utilized along with its current criteria.**</p> <p>For R8, it is recommended that the 3 components contained within the Lower VSL be staged for Lower, Moderate, and High VSL. For example, if an registered entity failed to fulfill one of the components (e.g., testing for less than 2 hours), this would result in a Lower VSL. If a registered entity failed two components (e.g., tested &lt; 2 hours AND it was done in more than 12 calendar months), then this would equate to a Moderate VSL. To fail to meet all three components would equate to a High VSL.</p>				
<p><b>Response:</b> R5: The SDT agrees and has modified the VSL for R5 to not rely upon a determination of the applicable percentages.</p>						
<p><b>R5 VSL</b></p>						
R5	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with</p>	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with</p>	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with</p>	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has not demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with</p>		

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Organization	Question 5:	Question 5 Comments:			
		<p><del>Requirement R5 but it only includes does not include</del> monitoring, control, logging, and alarming sufficient for maintaining compliance with <del>90%</del> one or more of the Requirements in the Reliability Standards applicable to a Balancing Authority and Transmission Operator respectively <u>that depend on the primary control center functionality and which have a Lower VRF.</u> <del>of its evidence is not dated.</del></p>	<p><del>Requirement R5 but it only includes does not include</del> monitoring, control, logging, and alarming sufficient for maintaining compliance with <del>80%</del> one or more of the Requirements in the Reliability Standards applicable to a Balancing Authority and Transmission Operator respectively <u>that depend on the primary control center functionality and which have a Medium VRF.</u></p>	<p><del>Requirement R5 but it only includes does not include</del> monitoring, control, logging, and alarming sufficient for maintaining compliance with <del>70%</del> one or more of the Requirements in the Reliability Standards applicable to a Balancing Authority and Transmission Operator respectively <u>that depend on the primary control center functionality and which have a High VRF.</u></p>	<p><del>Requirement R5.</del></p>
<p>R8: The SDT agrees and has modified the VSL for R8 accordingly.  <b>R8 VSL</b></p>					
<p><b>R8</b></p>		<p>The Reliability Coordinator, Balancing Authority, or <del>applicable</del> Transmission Operator <del>has provided evidence, such as dated records, that it has annually</del> tested its <del>dated, current, in force</del> Operating Plan for</p>	<p>The Reliability Coordinator, Balancing Authority, or Transmission Operator <u>has annually tested its Operating Plan for backup functionality, but two of the following occurred: 1) the demonstration was for</u></p>	<p>The Reliability Coordinator, Balancing Authority, or Transmission Operator <u>has annually tested its Operating Plan for backup functionality, but all three of the following occurred: 1) the demonstration was</u></p>	<p>The Reliability Coordinator, Balancing Authority, or <del>applicable</del> Transmission Operator has not annually tested its <del>dated, current, in force</del> Operating Plan for backup functionality.</p>

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Organization	Question 5:	Question 5 Comments:				
		<p>backup functionality, but one of the following occurred: 1) the demonstration was <del>with evidence of its last issue, through actual implementation or test operations</del> for less than two continuous hours, 2) <del>or</del> it has failed to demonstrate that the transition time period is less than or equal to two hours, <del>or it was done in more than twelve calendar months or 3</del> 3) test results <del>and lessons learned were not incorporated</del> documented <del>in subsequent revisions of the Operating Plan for backup functionality.</del></p>	<p><u>less than two continuous hours, 2) it has failed to demonstrate that the transition time period is less than or equal to two hours, or 3) test results were not documented. N/A</u></p>	<p><u>for less than two continuous hours, 2) it has failed to demonstrate that the transition time period is less than or equal to two hours, and 3) test results were not documented. N/A</u></p>		
Duke Energy	No	<p>Once the requirements are revised, the VSLs need to be revisited and cleaned up accordingly. For example, the Lower, Medium and High VSLs for R4 and R5 are unworkable - how can anyone document that the backup functionality includes monitoring, control, logging and alarming sufficient to maintain compliance with 90%,80%, 70% of the applicable requirements of other standards? This would require an impossible burden of recordkeeping.</p> <p>The VSL for R8 imposes a new requirement - that the entity demonstrate through a test that the transition time is less than or equal to two hours.</p>				

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Organization	Question 5:	Question 5 Comments:			
<p><b>Response:</b> R4 and R5: The SDT agrees and has modified the VSLs for Requirements R4 and R5 to not rely upon percentages.</p>					
<p><b>R4 VSL</b></p>					
<p><b>R4</b></p>	<p>The Reliability Coordinator has demonstrated that it has a backup control center facility (provided through its own dedicated backup facility or at another entity's control center <u>with certified Reliability Coordinator operators</u>) in accordance with <del>Requirement R4</del> but it <del>only provides</del> <u>does not provide</u> the functionality required for maintaining compliance with <del>90%</del> <u>one or more of the Requirements in the Reliability Standards applicable to the Reliability Coordinator that depend on the primary control center functionality and which have a Lower VRF.</u> <del>of the evidence of the demonstration is not dated</del></p>	<p>The Reliability Coordinator has demonstrated that it has a backup control center facility (provided through its own dedicated backup facility or at another entity's control center <u>with certified Reliability Coordinator operators</u>) in accordance with <del>Requirement R4</del> but it <del>only provides</del> <u>does not provide</u> the functionality required for maintaining compliance with <del>80%</del> <u>one or more of the Requirements in the Reliability Standards applicable to the Reliability Coordinator that depend on the primary control center functionality and which have a Medium VRF.</u></p>	<p>The Reliability Coordinator has demonstrated that it has a backup control center facility (provided through its own dedicated backup facility or at another entity's control center <u>with certified Reliability Coordinator operators</u>) in accordance with <del>Requirement R4</del> but it <del>only provides</del> <u>does not provide</u> the functionality required for maintaining compliance with <del>70%</del> <u>one or more of the Requirements in the Reliability Standards applicable to the Reliability Coordinator that depend on the primary control center functionality and which have a High VRF.</u></p>	<p>The Reliability Coordinator has not demonstrated that it has a backup control center facility (provided through its own dedicated backup facility or at another entity's control center <u>with certified Reliability Coordinator operators</u>) in accordance with <del>Requirement R4</del>.</p>	

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Organization	Question 5:	Question 5 Comments:			
<b>R5 VSL</b>					
R5		<p>The Balancing Authority or <del>applicable</del> Transmission Operator has demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with <del>Requirement R5 but it only includes</del> <u>does not include</u> monitoring, control, logging, and alarming sufficient for maintaining compliance with <del>90%</del> <u>one or more of the Requirements in the Reliability Standards applicable to a Balancing Authority and Transmission Operator respectively that depend on the primary control center functionality and which have a Lower VRF.</u> <del>of its evidence is not dated.</del></p>	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with <del>Requirement R5 but it only includes</del> <u>does not include</u> monitoring, control, logging, and alarming sufficient for maintaining compliance with <del>80%</del> <u>one or more of the Requirements in the Reliability Standards applicable to a Balancing Authority and Transmission Operator respectively that depend on the primary control center functionality and which have a Medium VRF.</u></p>	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with <del>Requirement R5 but it only includes</del> <u>does not include</u> monitoring, control, logging, and alarming sufficient for maintaining compliance with <del>70%</del> <u>one or more of the Requirements in the Reliability Standards applicable to a Balancing Authority and Transmission Operator respectively that depend on the primary control center functionality and which have a High VRF.</u></p>	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has not demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with <del>Requirement R5.</del></p>

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Organization	Question 5:	Question 5 Comments:			
<p>R8: Requirement R1.5 clearly indicates a transition time that is not to exceed 2 hours so demonstrating this in the annual test is not a new requirement. However, to avoid confusion, the SDT has altered the wording of Requirement R1.5. The SDT has also modified the High VSL for Requirement R1 to address the importance of this transition time.</p> <p><b>R1.5</b> A transition period between the loss of primary control center functionality and the time to fully implement the backup <u>functionality that is less than or equal to plan and get backup functionality up and running that is less than two hours.</u></p> <p><b>R1 VSL</b></p>					
<p><b>R1</b></p>	<p>The Reliability Coordinator, Balancing Authority, or <del>applicable</del> Transmission Operator has <del>a</del> <u>current</u> Operating Plan for backup functionality but the plan is missing one of the sub-requirements or the plan <del>is does not dated with evidence</del> <u>reflect the date of its last issue</u> <del>issuance</del>.</p>	<p>The Reliability Coordinator, Balancing Authority, or <del>applicable</del> Transmission Operator has <del>a</del> <u>current</u> Operating Plan for backup functionality but the plan is missing two of the sub-requirements</p>	<p>The Reliability Coordinator, Balancing Authority, or <del>applicable</del> Transmission Operator has <del>a</del> <u>current</u> Operating Plan for backup functionality but the plan is missing three or more of the sub-requirements <u>or is not compliant with Requirement R1.5.</u></p>	<p>The Reliability Coordinator, Balancing Authority, or <del>applicable</del> Transmission Operator does not have <del>a</del> <u>current</u> Operating Plan for backup functionality.</p>	
<p>MRO NERC Standards Review Subcommittee</p>	<p>No</p>	<p>R1, part of the Lower VSL category of non compliance is "...not dated with evidence of its last issue date.", this is not contained within any part of R1. The VSL Criteria Straw man Document sites that for procedures/programs, in the Lower Category, "The responsible entity has demonstrated the existence of required procedure/program but is missing minor details or minor program/procedural elements. Such deficiencies would not impact the achievement of the objective of the requirement." Recommend that "?not dated with evidence of its last issue date." be deleted from R1's VSL.</p> <p>R4, part of the Lower VSL category of non compliance is "?or the evidence of its demonstration is not dated.", this is not contained within any part of R4. The VSL Criteria Straw man Document sites that for procedures/programs, in the Lower Category, "The responsible entity has demonstrated the existence of required procedure/program but is missing minor details or minor program/procedural elements. Such deficiencies would not impact the achievement of the objective of the requirement." Recommend that "?or the evidence of its demonstration is not dated" be deleted from R4's VSL.</p>			

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Organization	Question 5:	Question 5 Comments:			
		<p>R5, part of the Lower VSL category of non compliance is "?or its evidence is not dated.", this is not contained within any part of R5. The VSL Criteria Straw man Document sites that for procedures/programs, in the Lower Category, "The responsible entity has demonstrated the existence of required procedure/program but is missing minor details or minor program/procedural elements. Such deficiencies would not impact the achievement of the objective of the requirement." Recommend that "...or its evidence is not dated" be deleted from R5's VSL.</p> <p>R7, part of the Severe VSL category of non compliance states "?dated evidence shows that?", the word "dated" is not contained within any part of R7.</p> <p>R8, part of the Lower VSL category of non compliance is "?has provided evidence, such as dated records, that it has tested its dated, current, in force Operating Plan for backup functionally, with evidence of its last issue, through actual implementation?" If an Entity accomplished this they would BE compliant. Perhaps the SDT forgot to add a deficiency (negative aspect) to a minor detail within the VSL. Overall it seems that the SDT has been directed to place some sort of "date (d)" qualifier within the VSLs. If there is another document that is directing this (i.e., Generally Accepted Government Accounting Standards?), it would be helpful to the Utility Industry of what that document is. VSLs should be a direct reflection of the Requirements.</p>			
<p><b>Response:</b> R1 – The SDT has modified the requirement to add a timing factor. This is now also reflected in the VSL.</p> <p><b>R1</b> Each Reliability Coordinator, Balancing Authority, and <del>applicable</del> Transmission Operator shall have a <del>current</del> Operating Plan describing the manner in which it ensures reliable operations of the BES in the event that its primary control center becomes inoperable. This Operating Plan for backup functionality shall include the following at a minimum:</p> <p>R1 VSL</p>					
<p><b>R1</b></p>		<p>The Reliability Coordinator, Balancing Authority, or <del>applicable</del> Transmission Operator has a <del>current</del> Operating Plan for backup functionality but the plan is missing one of the sub-requirements or the plan <del>is does not dated</del></p>	<p>The Reliability Coordinator, Balancing Authority, or <del>applicable</del> Transmission Operator has a <del>current</del> Operating Plan for backup functionality but the plan is missing two of the sub-requirements.</p>	<p>The Reliability Coordinator, Balancing Authority, or <del>applicable</del> Transmission Operator has a <del>current</del> Operating Plan for backup functionality but the plan is missing three or more of the sub-requirements <del>or is not compliant with</del></p>	<p>The Reliability Coordinator, Balancing Authority, or <del>applicable</del> Transmission Operator does not have a <del>current</del> Operating Plan for backup functionality.</p>

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Organization	Question 5:	Question 5 Comments:			
		<p><del>with evidence</del> reflect  <u>the date</u> of its last  <del>issue</del> issuance.</p>		<p><a href="#">Requirement R1.5.</a></p>	
<p>R7 – “Dated” has been deleted from the VSL.  <b>R7 VSL</b></p>					
<p><b>R7</b></p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>	<p>The Reliability Coordinator, Balancing Authority, or <del>applicable</del> Transmission Operator’s <del>dated</del> evidence <u>does not demonstrate</u> <del>shows</del> that its <u>primary and backup capabilities</u> <del>does not depend on each other or any common facility</del> <del>the primary control center</del> for the functionality required to maintain compliance with Reliability Standards <u>that depend on the primary control functionality.</u></p>
<p><b>R4, R5, R8 -</b> The word “dated” was removed from the Lower VSLs for both Requirement R4 and Requirement R5 and from the Lower and Severe VSLs for Requirement R8 as suggested.</p>					
<p><b>R4</b></p>	<p>The Reliability Coordinator has demonstrated that it has a backup control</p>	<p>The Reliability Coordinator has demonstrated that it has a backup control</p>	<p>The Reliability Coordinator has demonstrated that it has a backup control</p>	<p>The Reliability Coordinator has not demonstrated that it has a backup control</p>	

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Organization	Question 5:	Question 5 Comments:				
		<p>center facility (provided through its own dedicated backup facility or at another entity's control center <a href="#">with certified Reliability Coordinator operators</a>) in accordance with <del>Requirement R4</del> but it <del>only provides</del> <u>does not provide</u> the functionality required for maintaining compliance with <del>90%</del> <u>one or more</u> of the <a href="#">Requirements in the Reliability Standards applicable to the Reliability Coordinator that depend on the primary control center functionality and which have a Lower VRF.</a> <del>of the evidence of the demonstration is not dated.</del></p>	<p>center facility (provided through its own dedicated backup facility or at another entity's control center <a href="#">with certified Reliability Coordinator operators</a>) in accordance with <del>Requirement R4</del> but it <del>only provides</del> <u>does not provide</u> the functionality required for maintaining compliance with <del>80%</del> <u>one or more</u> of the <a href="#">Requirements in the Reliability Standards applicable to the Reliability Coordinator that depend on the primary control center functionality and which have a Medium VRF.</a></p>	<p>center facility (provided through its own dedicated backup facility or at another entity's control center <a href="#">with certified Reliability Coordinator operators</a>) in accordance with <del>Requirement R4</del> but it <del>only provides</del> <u>does not provide</u> the functionality required for maintaining compliance with <del>70%</del> <u>one or more</u> of the <a href="#">Requirements in the Reliability Standards applicable to the Reliability Coordinator that depend on the primary control center functionality and which have a High VRF.</a></p>	<p>center facility (provided through its own dedicated backup facility or at another entity's control center <a href="#">with certified Reliability Coordinator operators</a>) in accordance with <del>Requirement R4</del>.</p>	
<p><b>R5</b></p>		<p>The Balancing Authority or <del>applicable</del> Transmission Operator has demonstrated that it has backup functionality (provided either through a backup control center</p>	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has demonstrated that it has backup functionality (provided either through a backup control center</p>	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has demonstrated that it has backup functionality (provided either through a backup control center</p>	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has not demonstrated that it has backup functionality (provided either through a backup control center</p>	

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Organization	Question 5:	Question 5 Comments:				
		facility or contracted services) in accordance with <del>Requirement R5</del> but it <del>only includes</del> <u>does not include</u> monitoring, control, logging, and alarming sufficient for maintaining compliance with <del>90%</del> <u>one or more</u> of the <u>Requirements in the Reliability Standards applicable to a Balancing Authority and Transmission Operator respectively that depend on the primary control center functionality and which have a Lower VRF.</u> <del>of its evidence is not dated.</del>	facility or contracted services) in accordance with <del>Requirement R5</del> but it <del>only includes</del> <u>does not include</u> monitoring, control, logging, and alarming sufficient for maintaining compliance with <del>80%</del> <u>one or more</u> of the <u>Requirements in the Reliability Standards applicable to a Balancing Authority and Transmission Operator respectively that depend on the primary control center functionality and which have a Medium VRF.</u>	facility or contracted services) in accordance with <del>Requirement R5</del> but it <del>only includes</del> <u>does not include</u> monitoring, control, logging, and alarming sufficient for maintaining compliance with <del>70%</del> <u>one or more</u> of the <u>Requirements in the Reliability Standards applicable to a Balancing Authority and Transmission Operator respectively that depend on the primary control center functionality and which have a High VRF.</u>	facility or contracted services) in accordance with <del>Requirement R5</del> .	
R8		The Reliability Coordinator, Balancing Authority, or <del>applicable</del> Transmission Operator <del>has provided evidence, such as dated records, that it</del> has <u>annually</u> tested its <del>dated, current, in force</del> Operating Plan for backup functionality,	<u>The Reliability Coordinator, Balancing Authority, or Transmission Operator has annually tested its Operating Plan for backup functionality, but two of the following occurred: 1) the demonstration was for less than two</u>	<u>The Reliability Coordinator, Balancing Authority, or Transmission Operator has annually tested its Operating Plan for backup functionality, but all three of the following occurred: 1) the demonstration was for less than two</u>	The Reliability Coordinator, Balancing Authority, or <del>applicable</del> Transmission Operator has not annually tested its <del>dated, current, in force</del> Operating Plan for backup functionality.	

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Organization	Question 5:	Question 5 Comments:				
		<p><del>but one of the following occurred: 1) the demonstration was with evidence of its last issue, through actual implementation or test operations</del> for less than two continuous hours, <del>2) or it has failed to demonstrate that the transition time period is less than or equal to two hours, or it was done in more than twelve calendar months or 3) test results and lessons learned were not incorporated</del> <u>documented in subsequent revisions of the Operating Plan for backup functionality.</u></p>	<p><u>continuous hours, 2) it has failed to demonstrate that the transition time period is less than or equal to two hours, or 3) test results were not documented.</u> <del>N/A</del></p>	<p><u>continuous hours, 2) it has failed to demonstrate that the transition time period is less than or equal to two hours, and 3) test results were not documented.</u> <del>N/A</del></p>		
ITC	No	<p>The VSLs for Requirement 3 don't make any sense. Per comments elsewhere, this requirement should be re-written to focus on delegated functions. It is unlikely multiple entities would be involved as implied in the VSLs.</p> <p>For requirement 4 and 5, the VSL would be nearly impossible to calculate or measure from a practical standpoint. The VSL should not be focused on the number of other Standards that would be violated, but on the Plan itself or the functions.</p> <p>For requirement 7, the only VSL (severe) does not make any sense, further evidence that the requirement itself is not appropriate, as commented elsewhere.</p> <p>For requirement 8, the drafting team should develop VSLs for all levels, similar to requirement 1.</p>				

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Organization	Question 5:	Question 5 Comments:			
<p><b>Response:</b> R3: The SDT agrees and has modified the VSL for Requirement R3. The SDT does believe that multiple entities may well be involved, but determined to define the VSL against other factors than the percentage of entities that were not provided for.</p> <p><b>R3 VSL</b></p>					
<p><b>R3</b></p>		<p>The <u>Reliability Coordinator, Balancing Authority, or applicable</u> Transmission Operator directing BES operations through other entities has not <u>ensured against</u> <del>included provisions for</del> the loss of such entity's control functionality <u>that is depended upon for compliance with one or more Requirements in the Reliability Standards having a Lower VRF for 10% or less of its applicable entities</u> in its Operating Plan for backup functionality.</p>	<p>The <u>Reliability Coordinator, Balancing Authority, or applicable</u> Transmission Operator directing BES operations through other entities has not <u>ensured against</u> <del>included provisions for</del> the loss of such entity's control functionality <u>that is depended upon for compliance with one or more Requirements in the Reliability Standards having a Medium VRF for more than 10% and less than 25% of its applicable entities</u> in its Operating Plan for backup functionality.</p>	<p>The <u>Reliability Coordinator, Balancing Authority, or applicable</u> Transmission Operator directing BES operations through other entities has not <u>ensured against</u> <del>included provisions for</del> the loss of such entity's control functionality <u>that is depended upon for compliance with one or more Requirements in the Reliability Standards having a High VRF for more than 25% of its applicable entities</u> in its Operating Plan for backup functionality.</p>	<p>The <u>Reliability Coordinator, Balancing Authority, or applicable</u> Transmission Operator directing BES operations through other entities has not <u>ensured against</u> <del>included provisions for</del> the loss of any such entity's control functionality in its Operating Plan for backup functionality.</p>
<p>R4 and R5: The SDT agrees and has modified the VSL for Requirements R4 and R5 to not rely on percentages.</p> <p><b>R4 VSL</b></p>					
<p><b>R4</b></p>	<p>The Reliability Coordinator has demonstrated that it</p>	<p>The Reliability Coordinator has demonstrated that it</p>	<p>The Reliability Coordinator has demonstrated that it</p>	<p>The Reliability Coordinator has not demonstrated that it</p>	

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Organization	Question 5:	Question 5 Comments:				
		<p>has a backup control center facility (provided through its own dedicated backup facility or at another entity's control center with certified Reliability Coordinator operators) in accordance with <del>Requirement R4</del> but it <del>only provides</del> does not provide the functionality required for maintaining compliance with <del>90%</del> one or more of the Requirements in the Reliability Standards applicable to the Reliability Coordinator that depend on the primary control center functionality and which have a Lower VRF. <del>of the evidence of the demonstration is not dated</del></p>	<p>has a backup control center facility (provided through its own dedicated backup facility or at another entity's control center with certified Reliability Coordinator operators) in accordance with <del>Requirement R4</del> but it <del>only provides</del> does not provide the functionality required for maintaining compliance with <del>80%</del> one or more of the Requirements in the Reliability Standards applicable to the Reliability Coordinator that depend on the primary control center functionality and which have a Medium VRF.</p>	<p>has a backup control center facility (provided through its own dedicated backup facility or at another entity's control center with certified Reliability Coordinator operators) in accordance with <del>Requirement R4</del> but it <del>only provides</del> does not provide the functionality required for maintaining compliance with <del>70%</del> one or more of the Requirements in the Reliability Standards applicable to the Reliability Coordinator that depend on the primary control center functionality and which have a High VRF.</p>	<p>has a backup control center facility (provided through its own dedicated backup facility or at another entity's control center with certified Reliability Coordinator operators) in accordance with <del>Requirement R4</del>.</p>	
<b>R5 VSL</b>						
<b>R5</b>		<p>The Balancing Authority or <del>applicable</del> Transmission Operator has demonstrated that it has backup</p>	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has demonstrated that it has backup</p>	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has demonstrated that it has backup</p>	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has not demonstrated that it has backup</p>	

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Organization	Question 5:	Question 5 Comments:			
		functionality (provided either through a backup control center facility or contracted services) in accordance with <del>Requirement R5</del> but it <del>only includes</del> <u>does not include</u> monitoring, control, logging, and alarming sufficient for maintaining compliance with <del>90%</del> <u>one or more of the Requirements in the Reliability Standards applicable to a Balancing Authority and Transmission Operator respectively that depend on the primary control center functionality and which have a Lower VRF.</u> <del>its evidence is not dated.</del>	functionality (provided either through a backup control center facility or contracted services) in accordance with <del>Requirement R5</del> but it <del>only includes</del> <u>does not include</u> monitoring, control, logging, and alarming sufficient for maintaining compliance with <del>80%</del> <u>one or more of the Requirements in the Reliability Standards applicable to a Balancing Authority and Transmission Operator respectively that depend on the primary control center functionality and which have a Medium VRF.</u>	functionality (provided either through a backup control center facility or contracted services) in accordance with <del>Requirement R5</del> but it <del>only includes</del> <u>does not include</u> monitoring, control, logging, and alarming sufficient for maintaining compliance with <del>70%</del> <u>one or more of the Requirements in the Reliability Standards applicable to a Balancing Authority and Transmission Operator respectively that depend on the primary control center functionality and which have a High VRF.</u>	functionality (provided either through a backup control center facility or contracted services) in accordance with <del>Requirement R5</del> .
<p>R7: As noted previously, the SDT believes that Requirement R7 is needed. The SDT believes that Requirement R7 is a standalone requirement as Requirement R1 covers the plan and Requirement R7 the capabilities. However, Requirement R7 has been re-written to provide additional clarity as to what was the intent of the SDT and the VSL has been clarified as well.</p> <p><del>R7. Each Reliability Coordinator, Balancing Authority, and applicable-Transmission Operator shall have primary and backup capabilities that does not depend on the primary control center each other or any single data center for any functionality required to maintain compliance with Reliability Standards that depend on the primary control functionality.</del></p> <p><b>R7 VSL</b></p>					

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Organization	Question 5:	Question 5 Comments:			
R7	N/A	N/A	N/A	N/A	<p>The Reliability Coordinator, Balancing Authority, or <del>applicable</del> Transmission Operator's <del>dated</del> evidence <del>does not demonstrate</del> shows that its <u>primary and backup</u> capability <del>ies does not</del> depend on <u>each other or any common facility</u> <del>the primary control center</del> for the functionality required to maintain compliance with Reliability Standards <u>that depend on the primary control functionality</u>.</p>
R8: The SDT agrees and has defined all four VSL categories for Requirement R8.					
<b>R8 VSL</b>					
R8		<p>The Reliability Coordinator, Balancing Authority, or <del>applicable</del> Transmission Operator <del>has provided evidence, such as dated records, that it has annually</del> tested its <del>dated, current, in force</del> Operating Plan for backup functionality,</p>	<p>The Reliability Coordinator, Balancing Authority, or <del>Transmission Operator</del> has annually tested its <u>Operating Plan for backup functionality, but two of the following occurred: 1) the demonstration was for less than two</u></p>	<p>The Reliability Coordinator, Balancing Authority, or <del>Transmission Operator</del> has annually tested its <u>Operating Plan for backup functionality, but all three of the following occurred: 1) the demonstration was for less than two</u></p>	<p>The Reliability Coordinator, Balancing Authority, or <del>applicable</del> Transmission Operator has not annually tested its <del>dated, current, in force</del> Operating Plan for backup functionality.</p>

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Organization	Question 5:	Question 5 Comments:				
		<p><u>but one of the following occurred: 1) the demonstration was with evidence of its last issue, through actual implementation or test operations for less than two continuous hours, 2) or it has failed to demonstrate that the transition time period is less than or equal to two hours, or it was done in more than twelve calendar months or 3) test results and lessons learned were not incorporated documented in subsequent revisions of the Operating Plan for backup functionality.</u></p>	<p><u>continuous hours, 2) it has failed to demonstrate that the transition time period is less than or equal to two hours, or 3) test results were not documented. - N/A</u></p>	<p><u>continuous hours, 2) it has failed to demonstrate that the transition time period is less than or equal to two hours, and 3) test results were not documented. - N/A</u></p>		
Western Area Power Administration	No	Suggestion is to apply percentage levels to requirements as opposed to percentage levels to standards (as this is currently written).				
<p><b>Response:</b> R4 and R5: The SDT has modified the VSL to not rely on percentages.</p>						
<p><b>R4 VSL</b></p>						
R4	The Reliability Coordinator has	The Reliability Coordinator has	The Reliability Coordinator has	The Reliability Coordinator has not		

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Organization	Question 5:	Question 5 Comments:				
		<p>demonstrated that it has a backup control center facility (provided through its own dedicated backup facility or at another entity's control center with certified Reliability Coordinator operators) in accordance with <del>Requirement R4</del> but it <del>only provides</del> does not provide the functionality required for maintaining compliance with <del>90%</del>one or more of the Requirements in the Reliability Standards applicable to the Reliability Coordinator that depend on the primary control center functionality and which have a Lower VRF. <del>of the evidence of the demonstration is not dated.</del></p>	<p>demonstrated that it has a backup control center facility (provided through its own dedicated backup facility or at another entity's control center with certified Reliability Coordinator operators) in accordance with <del>Requirement R4</del> but it <del>only provides</del> does not provide the functionality required for maintaining compliance with <del>80%</del>one or more of the Requirements in the Reliability Standards applicable to the Reliability Coordinator that depend on the primary control center functionality and which have a Medium VRF.</p>	<p>demonstrated that it has a backup control center facility (provided through its own dedicated backup facility or at another entity's control center with certified Reliability Coordinator operators) in accordance with <del>Requirement R4</del> but it <del>only provides</del> does not provide the functionality required for maintaining compliance with <del>70%</del>one or more of the Requirements in the Reliability Standards applicable to the Reliability Coordinator that depend on the primary control center functionality and which have a High VRF.</p>	<p>demonstrated that it has a backup control center facility (provided through its own dedicated backup facility or at another entity's control center with certified Reliability Coordinator operators) in accordance with <del>Requirement R4</del>.</p>	
<b>R5 VSL</b>						
<b>R5</b>		<p>The Balancing Authority or <del>applicable</del> Transmission Operator has demonstrated that</p>	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has demonstrated that</p>	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has demonstrated that</p>	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has not demonstrated</p>	

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Organization	Question 5:	Question 5 Comments:				
		<p>it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with <del>Requirement R5</del> but it <del>only includes</del> does not include monitoring, control, logging, and alarming sufficient for maintaining compliance with <del>90%</del> one or more of the <u>Requirements in the Reliability Standards applicable to a Balancing Authority and Transmission Operator respectively that depend on the primary control center functionality and which have a Lower VRF.</u> <del>of its evidence is not dated.</del></p>	<p>it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with <del>Requirement R5</del> but it <del>only includes</del> does not include monitoring, control, logging, and alarming sufficient for maintaining compliance with <del>80%</del> one or more of the <u>Requirements in the Reliability Standards applicable to a Balancing Authority and Transmission Operator respectively that depend on the primary control center functionality and which have a Medium VRF.</u></p>	<p>it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with <del>Requirement R5</del> but it <del>only includes</del> does not include monitoring, control, logging, and alarming sufficient for maintaining compliance with <del>70%</del> one or more of the <u>Requirements in the Reliability Standards applicable to a Balancing Authority and Transmission Operator respectively that depend on the primary control center functionality and which have a High VRF.</u></p>	<p>that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with <del>Requirement R5.</del></p>	
Pepco Holdings, Inc. - Affiliates	No	<p>R2 - need to recognize there may be more than one backup facility — wording implies one primary facility and one backup facility.</p> <p>R3 has increments on number of entities rather than number of BES facilities. Concentrating on entities does not address the real issue. R4 and R5 concentrate on percentage of standards met by relying on backup facility rather than number of facilities still under monitoring and control.</p>				

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Organization	Question 5:	Question 5 Comments:			
<p><b>Response:</b> R2: The SDT agrees and has modified the wording of the VSL for Requirement R2 to not rely on an assumption that there are only two facilities involved.</p> <p><b>R2 VSL</b></p>					
R2		<p>The Reliability Coordinator, Balancing Authority, or <del>applicable</del> Transmission Operator has an Operating Plan for backup functionality <del>but the plan is not located available in at one</del> all of its control locations <del>but at one location it is not the current plan.</del></p>	<p>The Reliability Coordinator, Balancing Authority, or <del>applicable</del> Transmission Operator has an Operating Plan for backup functionality <del>but the plan is not located available in at either</del> all of its control locations <del>but at all locations it is not the current plan.</del></p>	N/A	<p><del>N/A</del> <u>The Reliability Coordinator, Balancing Authority, or Transmission Operator has an Operating Plan for backup functionality but no version of the plan is available at all of its control locations.</u></p>
<p>R3: The SDT agrees and has modified the VSL to define levels against other factors than the percentage of entities that were not provided for.</p> <p><b>R3 VSL</b></p>					
R3		<p>The <u>Reliability Coordinator, Balancing Authority, or applicable</u> Transmission Operator directing BES operations through other entities has not <u>ensured against</u> <del>included provisions for</del> the loss of such entity's control functionality <u>that is depended upon for compliance with</u></p>	<p>The <u>Reliability Coordinator, Balancing Authority, or applicable</u> Transmission Operator directing BES operations through other entities has not <u>ensured against</u> <del>included provisions for</del> the loss of such entity's control functionality <u>that is depended upon for compliance with</u></p>	<p>The <u>Reliability Coordinator, Balancing Authority, or applicable</u> Transmission Operator directing BES operations through other entities has not <u>ensured against</u> <del>included provisions for</del> the loss of such entity's control functionality <u>that is depended upon for compliance with</u></p>	<p>The <u>Reliability Coordinator, Balancing Authority, or applicable</u> Transmission Operator directing BES operations through other entities has not <u>ensured against</u> <del>included provisions for</del> the loss of any such entity's control functionality in its Operating Plan for</p>

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Organization	Question 5:	Question 5 Comments:			
		<p><del>one or more Requirements in the Reliability Standards having a Lower VRF for 10% or less of its applicable entities</del> in its Operating Plan for backup functionality.</p>	<p><del>one or more Requirements in the Reliability Standards having a Medium VRF for more than 10% and less than 25% of its applicable entities</del> in its Operating Plan for backup functionality.</p>	<p><del>one or more Requirements in the Reliability Standards having a High VRF for more than 25% of its applicable entities</del> in its Operating Plan for backup functionality.</p>	<p>backup functionality.</p>
<p>R4 and R5: The SDT agrees and has modified the VSL for R4 and R5 to not rely on percentages.</p>					
<p><b>R4 VSL</b></p>					
<p><b>R4</b></p>		<p>The Reliability Coordinator has demonstrated that it has a backup control center facility (provided through its own dedicated backup facility or at another entity's control center with certified Reliability Coordinator operators) in accordance with <del>Requirement R4</del> but it <del>only provides</del> does not provide the functionality required for maintaining compliance with <del>90%</del> <u>one or more of the Requirements in the Reliability Standards</u></p>	<p>The Reliability Coordinator has demonstrated that it has a backup control center facility (provided through its own dedicated backup facility or at another entity's control center with certified Reliability Coordinator operators) in accordance with <del>Requirement R4</del> but it <del>only provides</del> does not provide the functionality required for maintaining compliance with <del>80%</del> <u>one or more of the Requirements in the Reliability Standards</u></p>	<p>The Reliability Coordinator has demonstrated that it has a backup control center facility (provided through its own dedicated backup facility or at another entity's control center with certified Reliability Coordinator operators) in accordance with <del>Requirement R4</del> but it <del>only provides</del> does not provide the functionality required for maintaining compliance with <del>70%</del> <u>one or more of the Requirements in the Reliability Standards</u></p>	<p>The Reliability Coordinator has not demonstrated that it has a backup control center facility (provided through its own dedicated backup facility or at another entity's control center with certified Reliability Coordinator operators) in accordance with <del>Requirement R4</del>.</p>

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Organization	Question 5:	Question 5 Comments:			
		<p>applicable to the Reliability Coordinator that depend on the primary control center functionality and which have a Lower VRF. <del>of the evidence of the demonstration is not dated.</del></p>	<p>applicable to the Reliability Coordinator that depend on the primary control center functionality and which have a Medium VRF.</p>	<p>applicable to the Reliability Coordinator that depend on the primary control center functionality and which have a High VRF.</p>	
<b>R5 VSL</b>					
<p><b>R5</b></p>		<p>The Balancing Authority or applicable Transmission Operator has demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with <del>Requirement R5</del> but it <del>only includes</del> does not include monitoring, control, logging, and alarming sufficient for maintaining compliance with <del>90%</del> one or more of the Requirements in the Reliability Standards applicable to a Balancing Authority</p>	<p>The Balancing Authority or applicable Transmission Operator has demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with <del>Requirement R5</del> but it <del>only includes</del> does not include monitoring, control, logging, and alarming sufficient for maintaining compliance with <del>80%</del> one or more of the Requirements in the Reliability Standards applicable to a Balancing Authority</p>	<p>The Balancing Authority or applicable Transmission Operator has demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with <del>Requirement R5</del> but it <del>only includes</del> does not include monitoring, control, logging, and alarming sufficient for maintaining compliance with <del>70%</del> one or more of the Requirements in the Reliability Standards applicable to a Balancing Authority</p>	<p>The Balancing Authority or applicable Transmission Operator has not demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with <del>Requirement R5</del>.</p>

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Organization	Question 5:	Question 5 Comments:			
		<p>and Transmission Operator respectively that depend on the primary control center functionality and which have a Lower VRF. <del>OF its evidence is not dated.</del></p>	<p>and Transmission Operator respectively that depend on the primary control center functionality and which have a Medium VRF.</p>	<p>and Transmission Operator respectively that depend on the primary control center functionality and which have a High VRF.</p>	
PJM Interconnection	No	Changes need to be made to address the primary/backup language (see 7 below)			
<p><b>Response:</b> Please see our response to question 7 comments.</p>					
Ameren	No	<p>Guideline 3 of FERC's order conditionally approving VSLs for the original 83 regulatory approved standards stipulates that the VSL should not add to the requirement. The Lower VSL of R1 does add a requirement for the document to be dated which violates Guideline 3.</p> <p>Requirement 1 fits the multi-component category of the VSL Guidelines. This category puts the number of sub-requirements that are missing from the Operating Plan into quartiles. Thus, the Lower VSL would be missing one or two sub-requirements the Moderate VSL would be missing three or four sub-requirements the High VSL would be missing five to six sub-requirements and the Severe VSL would be missing seven sub-requirements or the plan would not exist.</p> <p>The VSLs for Requirement 2 should use the term back-up capability along with primary control center for consistency with the requirements. We agree with these levels. The VSLs for Requirement 3 really don't make any sense. It implies there may be more than one other entity that a TOP is directing BES operations through. We don't think that this is likely. Additionally, the VSLs as written do not seem to fit any category within the VSL guidelines document. Why would the VSLs not be divided into quartiles?</p> <p>For the requirement 4, the Lower VSL violates FERC's guideline 3 established in their order conditionally approving VSLs since the VSL indicates a date which is not in the requirement. Additionally, the VSLs do not consider most of the range of possibilities foreseen by the drafting team. For example, compliance with 83% of the reliability standards does not fit any VSL. Review of these VSLs cause us to question if the associated requirement needs to be modified. If the requirement is that the BA or TOP has a backup capability plan, isn't the BA or TOP still required to comply with all other reliability standards? Thus, why does the requirement need to explicitly state this. Doesn't this present an opportunity for double</p>			

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Organization	Question 5:	Question 5 Comments:
		<p>jeopardy? For the requirement 5, the Lower VSL violates FERC's guideline 3 established in their order conditionally approving VSLs since the VSL indicates a date which is not in the requirement. Additionally, the VSLs do not consider most of the range of possibilities foreseen by the drafting team. For example, compliance with 83% of the reliability standards does not fit any VSL. Review of these VSLs cause us to question if the associated requirement needs to be modified. If the requirement is that the RC has a backup control center, isn't the RC still required to comply with all other reliability standards? Thus, why does the requirement need to explicitly state this. Doesn't this present an opportunity for double jeopardy? Perhaps the drafting team should consider applying VSLs based on if monitoring, control, logging and alarming are included in the backup capability. In its order approving VSLs, the FERC stated in paragraph 27 that they prefer graded VSLs whenever possible.</p> <p>For requirement 6, we believe a VSL could be written for each severity level using the time requirements established. For instance, high could apply to 18 months and severe to 21 months. Additionally, the VSLs for requirement 6 violation FERC's guideline 3 by requiring the Operating Plan to be dated. The associated requirement does not mention dating.</p> <p>For requirement 7, the only VSL does not make any sense. The VSL implies that the responsible entity may provide evidence that backup plan depends on the primary control center. Why would the responsible entity providing evidence of non-compliance be a severity level? The purpose of providing evidence is to demonstrate compliance. Is this requirement 7 even needed? There are requirements in this standard that require a backup plan. The responsible entity is responsible to comply with this standard and with all other standards even when operating with the backup plan. Can they comply with other standards if the backup plan depends on the primary control center and the primary control center is destroyed? No. Thus, they would violate many other standards. Thus, requirement 7 is implied and not needed explicitly as a requirement.</p> <p>For requirement 8, we do not support a mandatory testing time of two hours or a transition time of two hours. However, considering the requirement as written, we suggest the drafting team could develop VSLs for all levels. VSLs could be written as:</p> <p>Lower: Tested the back plan for less than 30 minutes or The transition time was more than two hours but less than or equal to 3 hours or the test results and lessons learned were not incorporated in subsequent revisions.</p> <p>Moderate: Tested the backup plan for 30 minutes or more but less than one hour. The transition time was more than three hours but less than or equal to four hours.</p> <p>High: Tested the back plan for one hour or more but less than 90 minutes or The transition time was more than four hours but less than or equal to five hours.</p> <p>Severe: Tested the back plan for 90 minutes or more but less than two hours or The transition time was more than five hours.</p> <p>For requirement 9, the VSL perpetuates some of the problems that are currently occurring with compliance monitoring of</p>

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Organization	Question 5:	Question 5 Comments:
		<p>requirements that have periodic reporting requirements to the Regional Entity. The Regional Entity either already has the evidence or a violation has occurred because the report was not submitted on time. The responsible entity should not have to redemonstrate to the compliance auditor that it submitted the plan to the Regional Entity since the compliance auditor is the Regional Entity.</p>
ISO/RTO Council	No	<p>Guideline 3 of FERC's order conditionally approving VSLs for the original 83 regulatory approved standards stipulates that the VSL should not add to the requirement. The Lower VSL of R1 does add a requirement for the document to be dated which violates Guideline 3.</p> <p>Requirement 1 fits the multi-component category of the VSL Guidelines. This category puts the number of sub-requirements that are missing from the Operating Plan into quartiles. Thus, the Lower VSL would be missing one or two sub-requirements the Moderate VSL would be missing three or four sub-requirements. the High VSL would be missing five to six sub-requirements and the Severe VSL would be missing seven sub-requirements or the plan would not exist.</p> <p>The VSLs for Requirement 2 should use the term back-up capability along with primary control center for consistency with the requirements. R2 requires a copy of the plan be provided at both the primary and backup facilities. Failing to provide any copy at all is a complete violation of the requirement and hence should be assigned a Severe VSL, not Medium (note that VSL is a measure of the extent to which a requirement is not met, not its impact). We therefore suggest to move the two conditions from Low/Medium to High/Severe in accordance with established VSL guideline.</p> <p>The VSLs for Requirement 3 really don't make any sense. It implies there may be more than one other entity that a TOP is directing BES operations through. We don't think that this is likely. Additionally, the VSLs as written do not seem to fit any category within the VSL guidelines document. Why would the VSLs not be divided into quartiles based the number of entities?</p> <p>For the requirement 4, the Lower VSL violates FERC's guideline 3 established in their order conditionally approving VSLs since the VSL indicates a date which is not in the requirement.</p> <p>Additionally, the VSLs do not consider most of the range of possibilities foreseen by the drafting team. For example, compliance with 83% of the reliability standards does not fit any VSL. Review of these VSLs cause us to question if the associated requirement needs to be modified. If the requirement is that the BA or TOP has a backup capability plan, isn't the BA or TOP still required to comply with all other reliability standards? Thus, why does the requirement need to explicitly state this. Doesn't this present an opportunity for double jeopardy? The Severe level should include a condition that the RC provides less than 70% of the functionality required for maintaining compliance with the Reliability Standards applicable to an RC. Otherwise, there will not be any VSL for RC providing functionality sufficient for maintaining compliance with, say, 40% of the Reliability Standards. Further, the proposed wording change, i.e., &lt;70%, covers the condition of not having any functionality at all to comply with reliability standards.</p>

Organization	Question 5:	Question 5 Comments:
		<p>For the requirement 5, the Lower VSL violates FERC's guideline 3 established in their order conditionally approving VSLs since the VSL indicates a date which is not in the requirement. Additionally, the VSLs do not consider most of the range of possibilities foreseen by the drafting team. For example, compliance with 83% of the reliability standards does not fit any VSL. Review of these VSLs cause us to question if the associated requirement needs to be modified. If the requirement is that the RC has a backup control center, isn't the RC still required to comply with all other reliability standards? Thus, why does the requirement need to explicitly state this. Doesn't this present an opportunity for double jeopardy? Perhaps the drafting team should consider applying VSLs based on if monitoring, control, logging and alarming are included in the backup capability. The Severe level should include a condition that the BA or TOP provides less than 70% of the functionality required for maintaining compliance with the Reliability Standards applicable to an RC. Otherwise, there will not be any VSL for RC providing functionality sufficient for maintaining compliance with, say, 40% of the Reliability Standards. Further, the proposed wording change, i.e., &lt;70%, covers the condition of not having any functionality at all to comply with reliability standards. In its order approving VSLs, the FERC stated in paragraph 27 that they prefer gradated VSLs whenever possible.</p> <p>For requirement 6, we believe a VSL could be written for each severity level using the time requirements established. For instance, high could apply to 18 months and severe to 21 months. Additionally, the VSLs for requirement 6 violate FERC's guideline 3 by requiring the Operating Plan to be dated. The associated requirement does not mention dating. There are no VSLs assigned to High and Severe. We suggest the SDT to provide the conditions that an entity fails to meet the bulk of the intent of this requirement (High) and fails to meet this requirement completely (Severe). For example, a High VSL can be assigned if the entity did not update its plan after 18 months or 120 calendar days after changes were made to the backup capability; a Severe for failing to update its plan for a longer time period or at all.</p> <p>For requirement 7, the only VSL does not make any sense. The VSL implies that the responsible entity may provide evidence that backup plan depends on the primary control center. Why would the responsible entity providing evidence of non-compliance be a severity level? The purpose of providing evidence is to demonstrate compliance. Is this requirement 7 even needed? There are requirements in this standard that require a backup plan. The responsible entity is responsible to comply with this standard and with all other standards even when operating with the backup plan. Can they comply with other standards if the backup plan depends on the primary control center and the primary control center is destroyed? No. Thus, they would violate many other standards. Thus, requirement 7 is implied and not needed explicitly as a requirement.</p> <p>For requirement 8, we do not support a mandatory testing time of two hours or a transition time of two hours. However, considering the requirement as written, we suggest the drafting team could develop VSLs for all levels. VSLs could be written as:</p> <p>Lower: Tested the back plan for 90 minutes or more but less than two hours or The transition time was more than two hours but less than or equal to 3 hours.</p> <p>Moderate: Tested the back plan for one hour or more but less than 90 minutes. The transition time was more than three</p>

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Organization	Question 5:	Question 5 Comments:
		<p>hours but less than or equal to four hours.</p> <p>High: Tested the backup plan for 30 minutes or more but less than one hour or The transition time was more than four hours but less than or equal to five hours.</p> <p>Severe: Tested the back up plan for less than 30 minutes or The transition time was more than five hours or or the test results and lessons learned were not incorporated in subsequent revisions.</p> <p>For requirement 9, the VSL perpetuates some of the problems that are currently occurring with compliance monitoring of requirements that have periodic reporting requirements to the Regional Entity. The Regional Entity either already has the evidence or a violation has occurred because the report was not submitted on time. The responsible entity should not have to redemonstrate to the compliance auditor that it submitted the plan to the Regional Entity since the compliance auditor is the Regional Entity.</p>
Midwest ISO	No	<p>Guideline 3 of FERC's order conditionally approving VSLs for the original 83 regulatory approved standards stipulates that the VSL should not add to the requirement.</p> <p>The Lower VSL of R1 does add a requirement for the document to be dated which violates Guideline 3. Requirement 1 fits the multi-component category of the VSL Guidelines. This category puts the number of sub-requirements that are missing from the Operating Plan into quartiles. Thus, the Lower VSL would be missing one or two sub-requirements the Moderate VSL would be missing three or four sub-requirements the High VSL would be missing five to six sub-requirements and the Severe VSL would be missing seven sub-requirements or the plan would not exist.</p> <p>The VSLs for Requirement 2 should use the term back-up capability along with primary control center for consistency with the requirements. We agree with these levels.</p> <p>The VSLs for Requirement 3 really don't make any sense. It implies there may be more than one other entity that a TOP is directing BES operations through. We don't think that this is likely. Additionally, the VSLs as written do not seem to fit any category within the VSL guidelines document. Why would the VSLs not be divided into quartiles?</p> <p>For the requirement 4, the Lower VSL violates FERC's guideline 3 established in their order conditionally approving VSLs since the VSL indicates a date which is not in the requirement. Additionally, the VSLs do not consider most of the range of possibilities foreseen by the drafting team. For example, compliance with 83% of the reliability standards does not fit any VSL. Review of these VSLs cause us to question if the associated requirement needs to be modified. If the requirement is that the BA or TOP has a backup capability plan, isn't the BA or TOP still required to comply with all other reliability standards? Thus, why does the requirement need to explicitly state this. Doesn't this present an opportunity for double jeopardy?</p>

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Organization	Question 5:	Question 5 Comments:
		<p>For the requirement 5, the Lower VSL violates FERC's guideline 3 established in their order conditionally approving VSLs since the VSL indicates a date which is not in the requirement. Additionally, the VSLs do not consider most of the range of possibilities foreseen by the drafting team. For example, compliance with 83% of the reliability standards does not fit any VSL. Review of these VSLs cause us to question if the associated requirement needs to be modified. If the requirement is that the RC has a backup control center, isn't the RC still required to comply with all other reliability standards? Thus, why does the requirement need to explicitly state this. Doesn't this present an opportunity for double jeopardy? Perhaps the drafting team should consider applying VSLs based on if monitoring, control, logging and alarming are included in the backup capability. In its order approving VSLs, the FERC stated in paragraph 27 that they prefer graded VSLs whenever possible.</p> <p>For requirement 6, we believe a VSL could be written for each severity level using the time requirements established. For instance, high could apply to 18 months and severe to 21 months. Additionally, the VSLs for requirement 6 violation FERC's guideline 3 by requiring the Operating Plan to be dated. The associated requirement does not mention dating.</p> <p>For requirement 7, the only VSL does not make any sense. The VSL implies that the responsible entity may provide evidence that backup plan depends on the primary control center. Why would the responsible entity providing evidence of non-compliance be a severity level? The purpose of providing evidence is to demonstrate compliance. Is this requirement 7 even needed? There are requirements in this standard that require a backup plan. The responsible entity is responsible to comply with this standard and with all other standards even when operating with the backup plan. Can they comply with other standards if the backup plan depends on the primary control center and the primary control center is destroyed? No. Thus, they would violate many other standards. Thus, requirement 7 is implied and not needed explicitly as a requirement.</p> <p>For requirement 8, we do not support a mandatory testing time of two hours or a transition time of two hours. However, considering the requirement as written, we suggest the drafting team could develop VSLs for all levels. VSLs could be written as:</p> <p>Lower: Tested the back plan for 90 minutes or more but less than two hours or The transition time was more than two hours but less than or equal to 3 hours or the test results and lessons learned were not incorporated in subsequent revisions.</p> <p>Moderate: Tested the back plan for one hour or more but less than 90 minutes The transition time was more than three hours but less than or equal to four hours.</p> <p>High: Tested the backup plan for 30 minutes or more but less than one hour or The transition time was more than four hours but less than or equal to five hours.</p> <p>Severe: Tested the back plan for less than 30 minutes or The transition time was more than five hours.</p> <p>For requirement 9, the VSL perpetuates some of the problems that are currently occurring with compliance monitoring of requirements that have periodic reporting requirements to the Regional Entity. The Regional Entity either already has the evidence or a violation has occurred because the report was not submitted on time. The responsible entity should not have</p>

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Organization	Question 5:	Question 5 Comments:			
		to redemonstrate to the compliance auditor that it submitted the plan to the Regional Entity since the compliance auditor is the Regional Entity.			
<p><b>Response:</b> R1 – The SDT has modified the requirement to add a timing factor.</p> <p>R2: While the terminology used was not identical it is technically correct and no change was made.</p> <p>R3: The SDT agrees and has modified the VSL for Requirement R3. The SDT does believe that multiple entities may well be involved, but determined to define the VSL against other factors than the percentage of entities that were not provided for.</p> <p><b>R3 VSL</b></p>					
R3		<p>The <u>Reliability Coordinator, Balancing Authority, or applicable</u> Transmission Operator directing BES operations through other entities has not <u>ensured against</u> <del>included provisions for</del> the loss of such entity's control functionality <u>that is depended upon for compliance with one or more Requirements in the Reliability Standards having a Lower VRF for 10% or less of its applicable entities in its Operating Plan for backup functionality.</u></p>	<p>The <u>Reliability Coordinator, Balancing Authority, or applicable</u> Transmission Operator directing BES operations through other entities has not <u>ensured against</u> <del>included provisions for</del> the loss of such entity's control functionality <u>that is depended upon for compliance with one or more Requirements in the Reliability Standards having a Medium VRF for more than 10% and less than 25% of its applicable entities in its Operating Plan for backup functionality.</u></p>	<p>The <u>Reliability Coordinator, Balancing Authority, or applicable</u> Transmission Operator directing BES operations through other entities has not <u>ensured against</u> <del>included provisions for</del> the loss of such entity's control functionality <u>that is depended upon for compliance with one or more Requirements in the Reliability Standards having a High VRF for more than 25% of its applicable entities in its Operating Plan for backup functionality.</u></p>	<p>The <u>Reliability Coordinator, Balancing Authority, or applicable</u> Transmission Operator directing BES operations through other entities has not <u>ensured against</u> <del>included provisions for</del> the loss of any such entity's control functionality in its Operating Plan for backup functionality.</p>
R4/R5: The SDT has modified the VSL for R4 and R5. The word, "dated" was removed from the Lower VSL for R4.					

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Organization	Question 5:	Question 5 Comments:			
Simply having a backup control center does not automatically imply that it will adhere to relevant standards, therefore the need for the phrase. Double jeopardy shouldn't be an issue as this requirement applies only to the backup.					
<b>R4 VSL</b>					
R4	<p>The Reliability Coordinator has demonstrated that it has a backup control center facility (provided through its own dedicated backup facility or at another entity's control center <u>with certified Reliability Coordinator operators</u>) in accordance with <del>Requirement R4</del> but it <del>only provides</del> does not provide the functionality required for maintaining compliance with <del>90%</del> one or more of the <u>Requirements in the Reliability Standards applicable to the Reliability Coordinator that depend on the primary control center functionality and which have a Lower VRF.</u> <del>of the evidence of the demonstration is not dated</del></p>	<p>The Reliability Coordinator has demonstrated that it has a backup control center facility (provided through its own dedicated backup facility or at another entity's control center <u>with certified Reliability Coordinator operators</u>) in accordance with <del>Requirement R4</del> but it <del>only provides</del> does not provide the functionality required for maintaining compliance with <del>80%</del> one or more of the <u>Requirements in the Reliability Standards applicable to the Reliability Coordinator that depend on the primary control center functionality and which have a Medium VRF.</u></p>	<p>The Reliability Coordinator has demonstrated that it has a backup control center facility (provided through its own dedicated backup facility or at another entity's control center <u>with certified Reliability Coordinator operators</u>) in accordance with <del>Requirement R4</del> but it <del>only provides</del> does not provide the functionality required for maintaining compliance with <del>70%</del> one or more of the <u>Requirements in the Reliability Standards applicable to the Reliability Coordinator that depend on the primary control center functionality and which have a High VRF.</u></p>	<p>The Reliability Coordinator has not demonstrated that it has a backup control center facility (provided through its own dedicated backup facility or at another entity's control center <u>with certified Reliability Coordinator operators</u>) in accordance with <del>Requirement R4</del>.</p>	

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Organization	Question 5:	Question 5 Comments:			
<b>R5 VSL</b>					
R5		<p>The Balancing Authority or <del>applicable</del> Transmission Operator has demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with <del>Requirement R5 but it only includes</del> <u>does not include</u> monitoring, control, logging, and alarming sufficient for maintaining compliance with <del>90%</del> <u>one or more of the Requirements in the Reliability Standards applicable to a Balancing Authority and Transmission Operator respectively that depend on the primary control center functionality and which have a Lower VRF.</u> <del>of its evidence is not dated.</del></p>	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with <del>Requirement R5 but it only includes</del> <u>does not include</u> monitoring, control, logging, and alarming sufficient for maintaining compliance with <del>80%</del> <u>one or more of the Requirements in the Reliability Standards applicable to a Balancing Authority and Transmission Operator respectively that depend on the primary control center functionality and which have a Medium VRF.</u></p>	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with <del>Requirement R5 but it only includes</del> <u>does not include</u> monitoring, control, logging, and alarming sufficient for maintaining compliance with <del>70%</del> <u>one or more of the Requirements in the Reliability Standards applicable to a Balancing Authority and Transmission Operator respectively that depend on the primary control center functionality and which have a High VRF.</u></p>	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has not demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with <del>Requirement R5.</del></p>

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Organization	Question 5:	Question 5 Comments:			
<p>R6: The requirement includes the phrase, “annually review and approve” and the only way to see if the plan has been reviewed and approved on an annual basis is to look at the dates of the documents over several years. No change made.</p> <p>R7: The SDT agrees and has modified the VSL for Requirement R7 to be based on an inability to show compliance rather than a showing of non-compliance. The SDT does believe Requirement R7 is an appropriate and needed requirement. While it may appear implied to some, the SDT believes it is too important an issue to be left to implication.</p> <p><b>R7 VSL</b></p>					
R7	N/A	N/A	N/A	N/A	<p>The Reliability Coordinator, Balancing Authority, or <del>applicable</del> Transmission Operator's <del>dated</del> evidence <del>does not demonstrate</del> <u>shows</u> that its <u>primary and backup capabilities</u> <del>does not depend on each other or any common facility</del> <del>the primary control center</del> for the functionality required to maintain compliance with Reliability Standards <u>that depend on the primary control functionality</u>.</p>
<p>R8: The SDT believes that a two-hour continuous test is appropriate in that it ensures that the functionality is tested through at least one full clock hour. The SDT did modify the VSL for Requirement R8 to reflect increasing levels of severity of non-compliance.</p> <p><b>R8 VSL</b></p>					
R8		The Reliability	<u>The Reliability</u>	<u>The Reliability</u>	The Reliability

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Organization	Question 5:	Question 5 Comments:				
		<p>Coordinator, Balancing Authority, or <del>applicable</del> Transmission Operator <del>has provided evidence, such as dated records, that it has annually</del> tested its <del>dated, current, in force</del> Operating Plan for backup functionality, but one of the following occurred: 1) the <del>demonstration was with evidence of its last issue, through actual implementation or test operations</del> for less than two continuous hours, 2) <del>or</del> it has failed to demonstrate that the transition time period is less than or equal to two hours, <del>or it was done in more than twelve calendar months or</del> 3) <del>test results and lessons learned were not incorporated</del> <u>documented</u> in subsequent revisions of the Operating Plan for backup functionality.</p>	<p><u>Coordinator, Balancing Authority, or Transmission Operator has annually tested its Operating Plan for backup functionality, but two of the following occurred: 1) the demonstration was for less than two continuous hours, 2) it has failed to demonstrate that the transition time period is less than or equal to two hours, or 3) test results were not documented. N/A</u></p>	<p><u>Coordinator, Balancing Authority, or Transmission Operator has annually tested its Operating Plan for backup functionality, but all three of the following occurred: 1) the demonstration was for less than two continuous hours, 2) it has failed to demonstrate that the transition time period is less than or equal to two hours, and 3) test results were not documented. N/A</u></p>	<p>Coordinator, Balancing Authority, or <del>applicable</del> Transmission Operator has not annually tested its <del>dated, current, in force</del> Operating Plan for backup functionality.</p>	

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Organization	Question 5:	Question 5 Comments:			
<p>R9: The SDT sees this as a necessary part of the documentation required and not a burdensome requirement so no change has been made.</p>					
<p>FirstEnergy Corp.</p>	<p>No</p>	<p>The VSLs for Requirement 3 implies this method of operation is employed only when a TOP is directing operations through more than one other entity. We don't believe this to be the norm. The drafting team should consider the failure to include provisions for the loss of a percentage of such entity's or entities' total control functionality rather than basing the compliance measurement on the percentage of entities.</p> <p>For the requirement 4, the VSL's should be revised based on the needed revisions to the associated requirement.</p> <p>For the requirement 5, the VSL's should be revised based on the needed revisions to the associated requirement.</p> <p>For requirement 6, we believe a VSL could be written for each severity level using the time requirements established. For instance, high could apply to 18 months and severe to 21 months.</p> <p>For requirement 7, the VSL's should be revised based on the needed revisions to the associated requirement.</p> <p>For requirement 8, there is nothing in Requirement 8 as currently proposed by the drafting team that requires a two hour test. If there is an expectation for a test of the backup center to last two hours, it should be stated in the requirement. The VSL for Requirement 8 should be rewritten based on the needed revisions to the associated requirement.</p> <p>For requirement 9, the Regional Entity either already has the evidence or a violation has occurred because the report was not submitted on time. The responsible entity should not have to redemonstrate to the compliance auditor that it submitted the plan to the Regional Entity since the compliance auditor is the Regional Entity.</p>			
<p><b>Response:</b> R3: The SDT agrees and has modified the VSL for Requirement R3. The SDT does believe that multiple entities may well be involved, but determined to define the VSL against other factors than the percentage of entities that were not provided for.</p> <p><b>R3 VSL</b></p>					
<p>R3</p>		<p>The <u>Reliability Coordinator, Balancing Authority, or applicable</u> Transmission Operator directing BES operations through other entities has not <u>ensured against</u></p>	<p>The <u>Reliability Coordinator, Balancing Authority, or applicable</u> Transmission Operator directing BES operations through other entities has not <u>ensured against</u></p>	<p>The <u>Reliability Coordinator, Balancing Authority, or applicable</u> Transmission Operator directing BES operations through other entities has not <u>ensured against</u></p>	<p>The <u>Reliability Coordinator, Balancing Authority, or applicable</u> Transmission Operator directing BES operations through other entities has not <u>ensured against</u></p>

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Organization	Question 5:	Question 5 Comments:			
		<p><del>included provisions for the loss of such entity's control functionality that is depended upon for compliance with one or more Requirements in the Reliability Standards having a Lower VRF for 10% or less of its applicable entities</del> in its Operating Plan for backup functionality.</p>	<p><del>included provisions for the loss of such entity's control functionality that is depended upon for compliance with one or more Requirements in the Reliability Standards having a Medium VRF for more than 10% and less than 25% of its applicable entities</del> in its Operating Plan for backup functionality.</p>	<p><del>included provisions for the loss of such entity's control functionality that is depended upon for compliance with one or more Requirements in the Reliability Standards having a High VRF for more than 25% of its applicable entities</del> in its Operating Plan for backup functionality.</p>	<p>included provisions for the loss of any such entity's control functionality in its Operating Plan for backup functionality.</p>
<p>R4/R5: The SDT agrees and has modified the VSL for Requirements R4 and R5 accordingly.</p>					
<p><b>R4 VSL</b></p>					
<p><b>R4</b></p>		<p>The Reliability Coordinator has demonstrated that it has a backup control center facility (provided through its own dedicated backup facility or at another entity's control center with certified Reliability Coordinator operators) in accordance with Requirement R4 but it <del>only provides</del> does not provide the functionality required</p>	<p>The Reliability Coordinator has demonstrated that it has a backup control center facility (provided through its own dedicated backup facility or at another entity's control center with certified Reliability Coordinator operators) in accordance with Requirement R4 but it <del>only provides</del> does not provide the functionality required</p>	<p>The Reliability Coordinator has demonstrated that it has a backup control center facility (provided through its own dedicated backup facility or at another entity's control center with certified Reliability Coordinator operators) in accordance with Requirement R4 but it <del>only provides</del> does not provide the functionality required</p>	<p>The Reliability Coordinator has not demonstrated that it has a backup control center facility (provided through its own dedicated backup facility or at another entity's control center with certified Reliability Coordinator operators) in accordance with Requirement R4.</p>

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Organization	Question 5:	Question 5 Comments:			
		<p>for maintaining compliance with <del>90%</del>one or more of the <u>Requirements in the Reliability Standards applicable to the Reliability Coordinator that depend on the primary control center functionality and which have a Lower VRF.</u> <del>of the evidence of the demonstration is not dated</del></p>	<p>for maintaining compliance with <del>80%</del>one or more of the <u>Requirements in the Reliability Standards applicable to the Reliability Coordinator that depend on the primary control center functionality and which have a Medium VRF.</u></p>	<p>for maintaining compliance with <del>70%</del>one or more of the <u>Requirements in the Reliability Standards applicable to the Reliability Coordinator that depend on the primary control center functionality and which have a High VRF.</u></p>	
<b>R5 VSL</b>					
<p><b>R5</b></p>		<p>The Balancing Authority or <del>applicable</del> Transmission Operator has demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with <del>Requirement R5 but it only includes</del>does not <u>include</u> monitoring, control, logging, and alarming sufficient for maintaining compliance with</p>	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with <del>Requirement R5 but it only includes</del>does not <u>include</u> monitoring, control, logging, and alarming sufficient for maintaining compliance with</p>	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with <del>Requirement R5 but it only includes</del>does not <u>include</u> monitoring, control, logging, and alarming sufficient for maintaining compliance with</p>	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has not demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with <del>Requirement R5.</del></p>

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Organization	Question 5:	Question 5 Comments:				
		<p><del>90%</del>one or more of the Requirements in the Reliability Standards applicable to a Balancing Authority and Transmission Operator respectively that depend on the primary control center functionality and which have a Lower VRF. <del>of its evidence is not dated.</del></p>	<p><del>80%</del>one or more of the Requirements in the Reliability Standards applicable to a Balancing Authority and Transmission Operator respectively that depend on the primary control center functionality and which have a Medium VRF.</p>	<p><del>70%</del>one or more of the Requirements in the Reliability Standards applicable to a Balancing Authority and Transmission Operator respectively that depend on the primary control center functionality and which have a High VRF</p>		
<p>R6: VSL for Requirement R6 was changed due to several comments.</p>						
<p><b>R6 VSL</b></p>						
R6		<p>The Reliability Coordinator, Balancing Authority, or applicable Transmission Operator, has evidence that it's dated, current, in force Operating Plan for backup functionality, with <del>evidence of its last issue,</del> was reviewed and approved but it was <del>not done in one calendar year more than twelve calendar months and less than or equal to fifteen</del></p>	<p><del>The Reliability Coordinator, Balancing Authority, or applicable Transmission Operator, has evidence that it's dated, current, in force Operating Plan for backup functionality, with evidence of its last issue, was reviewed and approved but it was not done in more than two calendar years fifteen calendar months or that it was updated more than</del></p>	<p><del>N/A</del> The Reliability Coordinator, Balancing Authority, or applicable Transmission Operator, has evidence that it's dated, current, in force Operating Plan for backup functionality, with evidence of its last issue, was reviewed and approved but it was not done in two calendar years or more or that it was updated more than ninety calendar days after any</p>	<p><del>N/A</del> The Reliability Coordinator, Balancing Authority, or Transmission Operator, does not have evidence that it's dated, current, in force Operating Plan for backup functionality was reviewed and approved.</p>	

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Organization	Question 5:	Question 5 Comments:			
		<p><del>calendar months</del> or that it was updated more than sixty calendar days and less than or equal to ninety calendar days after any changes <del>to the backup location,</del> capabilities described in <u>Requirement R1</u>, <del>or contact information</del></p>	<p><del>ninety calendar days after any changes to the backup location, capabilities, or contact information.</del> <u>N/A</u></p>	<p><u>changes to the capabilities described in Requirement R1.</u></p>	
<p>R8. Requirement R8.2 does require a minimum of two continuous hours so no changes were made. However, the VSL for Requirement R8 was changed in response to other comments.</p>					
<p><b>R8 VSL</b></p>					
<p><b>R8</b></p>		<p>The Reliability Coordinator, Balancing Authority, or <del>applicable</del> Transmission Operator <del>has provided evidence, such as dated records, that it has annually</del> tested its <del>dated, current, in force</del> Operating Plan for backup functionality, but one of the following occurred: 1) the demonstration was <del>with evidence of its last issue, through actual implementation or test operations</del> for less than</p>	<p><u>The Reliability Coordinator, Balancing Authority, or Transmission Operator has annually tested its Operating Plan for backup functionality, but two of the following occurred: 1) the demonstration was for less than two continuous hours, 2) it has failed to demonstrate that the transition time period is less than or equal to two hours, or 3) test results were not</u></p>	<p><u>The Reliability Coordinator, Balancing Authority, or Transmission Operator has annually tested its Operating Plan for backup functionality, but all three of the following occurred: 1) the demonstration was for less than two continuous hours, 2) it has failed to demonstrate that the transition time period is less than or equal to two hours, and 3) test results were not</u></p>	<p>The Reliability Coordinator, Balancing Authority, or <del>applicable</del> Transmission Operator has not annually tested its <del>dated, current, in force</del> Operating Plan for backup functionality.</p>

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Organization	Question 5:	Question 5 Comments:				
		<p>two continuous hours, <del>2) or</del> it has failed to demonstrate that the transition time period is less than or equal to two hours, <del>or it was done in more than twelve calendar months or 3</del> 3) test results and lessons learned were not incorporated documented in subsequent revisions of the Operating Plan for backup functionality.</p>	<p><del>documented in</del> N/A</p>	<p><del>documented.</del> N/A</p>		
<p>R9. The SDT sees this as a necessary part of the documentation required and not a burdensome requirement so no change has been made.</p>						
<p>WECC Reliability Coordinator Comment Working Group</p>	<p>Yes</p>					
<p>ComEd / Exelon</p>	<p>Yes</p>					
<p>Manitoba Hydro</p>	<p>Yes</p>					
<p>Entergy</p>	<p>Yes</p>					

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Organization	Question 5:	Question 5 Comments:
Services, Inc		
Electric Reliability Council of Texas, Inc.	Yes	
Oncor Electric Delivery	Yes	
Santee Cooper	Yes	
ReliabilityFirst Corporation	Yes	
Bonneville Power Administration	Yes	
AEP	Yes	
Bureau of Reclamation	Yes	
Northeast Utilities	Yes	
<p><b>Response:</b> Thank you for your response.</p>		

6. The SDT has provided an Implementation Plan with this posting. Do you agree with the implementation timeframe that shows all requirements going into effect on the same time/date? If not, please provide specific suggestions for improvement.

**Summary Consideration:**

The vast majority of the comments received were supportive of the Implementation Plan. There were only a very few comments that expressed concern about the ability to get backup capability fully functioning within 24 months of adoption of the standard. The SDT understands the importance of backup control capability to reliability and recognizes the balance between doing this rapidly and the practical realities of being able to accomplish it and the relative priority of other standards compliance activities. The SDT considered these questions and agrees with the majority of commenters that 24 months is the correct timeframe. Therefore, no changes have been made.

However, to provide clarity, the following requirements have been changed:

**R1.5** A transition period between the loss of primary control center functionality and the time to fully implement the backup functionality that is less than or equal to plan and get backup functionality up and running that is less than two hours.

**R5.** Each Balancing Authority and ~~applicable~~-Transmission Operator shall, ~~during the time period when the primary control center functionality and the backup functionality are both available for use,~~ have backup functionality (provided either through a backup control center facility or contracted services) that includes monitoring, control, logging, and alarming sufficient for maintaining compliance with all Reliability Standards ~~applicable that depend on~~ to a Balancing Authority and Transmission Operator's primary control center functionality respectively. To avoid requiring tertiary functionality, backup functionality is not required during:

**R5.1** Planned outages of the primary or backup functionality of two weeks or less

**R5.2** Unplanned outages of the primary or backup functionality

Organization	Question 6:	Question 6 Comments:
Puget Sound Energy	No	This depends on the interpretation of R.5. The statement of "during the time period when the primary control center and the back up functionality are both available for use" is vague. Does this refer to the time period when an entity is in the process of constructing a backup facility or is it referring to the transition time in R.1.5? If it is the time of R.1.5, this is a huge monetary and resource burden. Essentially it would require an entity to have a staffed fully redundant backup facility 24x7, or a contract with another entity with 24x7 staff properly trained to monitor, control, log and respond to alarms on another

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Organization	Question 6:	Question 6 Comments:
		entities entire system. If this is the case, then 24 months may not be adequate.
		<p><b>Response:</b> The SDT agrees with the majority of commenters that 24 months is the correct timeframe for this standard. However, R1.5 and R5 were clarified to avoid confusion as to what is required and R5.1 &amp; R5.2 have been added for additional clarity.</p> <p>It is intended that a backup to the backup is clearly not required. For example, it is intended to ensure that while you were operating out of your backup during loss of the primary control center that the requirement should not be interpreted to require an additional backup.</p> <p>This taken in concert with Requirement 1.5 contemplates that the backup can be activated and fully operational within 2 hours. It is the SDT opinion that this standard does not require a full-time fully-staffed backup capability. It is believed that off-duty trained operators can be called out in a manner to arrive at the backup capability within 2 hours, and that the control system used by the backup capability could either be always hot or able to be remotely started during the period that operators are en route.</p> <p><b>R1.5</b> A transition period between the loss of primary control center functionality and the time to fully implement the backup functionality that is less than or equal to <del>plan and get backup functionality up and running that is less than</del> two hours.</p> <p><b>R5.</b> Each Balancing Authority and applicable Transmission Operator shall, <del>during the time period when the primary control center functionality and the backup functionality are both available for use,</del> have backup functionality (provided either through a backup control center facility or contracted services) that includes monitoring, control, logging, and alarming sufficient for maintaining compliance with all Reliability Standards applicable that depend on <del>to</del> a Balancing Authority and Transmission Operator's primary control center functionality respectively. <del>To avoid requiring tertiary functionality, backup functionality is not required during:</del></p> <p><b>R5.1</b> <u>Planned outages of the primary or backup functionality of two weeks or less.</u></p> <p><b>R5.2</b> <u>Unplanned outages of the primary or backup functionality.</u></p>
Energy System Planning & Operations (Generation & Marketing)	No	Consider adding to the implementation requirement that entities comply within the timeframe stated or if an entity believes it will take longer than the specified time to become compliant, allowing entities to apply for an extension to the timeframe stated if that entity can justify the need for an extension to its Regional Compliance Entity. Each entity desiring the extension shall submit a plan and obtain approval from its Regional Compliance Entity within 6 months of approval of this standard. The Regional Compliance entity will review the requests and approve on a case by case basis. Compliance would be required after the date approved by the Regional Compliance Entity.
		<p><b>Response:</b> Procedures exist for an entity that has challenges complying with standards to work with the Regional Compliance Entity on mitigation plans. The SDT does not believe it would be appropriate to embed such concepts into standards.</p>
Progress	No	Effective Date — 24 months is not adequate time to address such a significant change in requirements from EOP-008-0.

Consideration of Comments on 2<sup>nd</sup> Draft of EOP-008-1 — Backup Facilities (Project 2006-04)

Organization	Question 6:	Question 6 Comments:
Energy Carolinas, Inc.		The requirement is changing from a recovery plan to a hot-standby backup available within 2 hours. Additional time is needed to choose a backup methodology, budget accordingly, purchase/construct a backup site (or negotiate with another entity, though the feasibility of this is questionable), design backup voice and data communications, and implement — all per CIP requirements while upgrading existing primary equipment/facilities to meet CIP requirements with implementation schedules through 2010. This requires multi-million dollar actions that must be addressed with a methodologically sound approach to avoid rework and undue financial burden. PEC suggests an implementation period of 1) 36 months for Substantial Progress (i.e. groundbreaking) and 2) 48 months for full implementation.
Progress Energy-Florida	No	Effective Date — 24 months is not adequate time to address such a significant change in requirements from EOP-008-0. The requirement is changing from a recovery plan to a hot-standby backup available within 2 hours. Additional time is needed to choose a backup methodology, budget accordingly, purchase/construct a backup site (or negotiate with another entity, though the feasibility of this is questionable), design backup voice and data communications, and implement —all per CIP requirements while upgrading existing primary equipment/facilities to meet CIP requirements with implementation schedules through 2010. This requires multi-million dollar actions that must be addressed with a methodologically sound approach to avoid rework and undue financial burden. PEF suggests an implementation period of 1) 36 months for Substantial Progress (i.e. groundbreaking) and 2) 48 months for full implementation.
<p><b>Response:</b> The SDT agrees with the majority of commenters that 24 months is the correct timeframe for this standard. Therefore, no changes have been made.</p>		
NPCC	Yes	
Southern Company Transmission	Yes	
Xcel Energy	Yes	
Duke Energy	Yes	
Electric Reliability Council of	Yes	

**Consideration of Comments on 2<sup>nd</sup> Draft of EOP-008-1 — Backup Facilities (Project 2006-04)**

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Organization	Question 6:	Question 6 Comments:
Texas, Inc.		
MRO NERC Standards Review Subcommittee	Yes	
ITC	Yes	
Oncor Electric Delivery	Yes	
Western Area Power Administration	Yes	
ISO New England Inc	Yes	
Independent Electricity System Operator	Yes	
Pepco Holdings, Inc. - Affiliates	Yes	
Santee Cooper	Yes	
ReliabilityFirst Corporation	Yes	

Consideration of Comments on 2<sup>nd</sup> Draft of EOP-008-1 — Backup Facilities (Project 2006-04)

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Organization	Question 6:	Question 6 Comments:
Bonneville Power Administration	Yes	
Brazos Electric Power Cooperative, Inc.	Yes	
Dynergy	Yes	
Hydro-Québec TransÉnergie (HQT)	Yes	
PJM Interconnection	Yes	
AEP	Yes	
Ameren	Yes	
FirstEnergy Corp.	Yes	
Bureau of Reclamation	Yes	
ISO/RTO Council	Yes	

**Consideration of Comments on 2<sup>nd</sup> Draft of EOP-008-1 — Backup Facilities (Project 2006-04)**

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Organization	Question 6:	Question 6 Comments:
Northeast Utilities	Yes	
Midwest ISO	Yes	
WECC Reliability Coordinator Comment Working Group	Yes	
San Diego Gas and Electric	Yes	
ComEd / Exelon	Yes	
Manitoba Hydro	Yes	
<p><b>Response:</b> Thank you for your response.</p>		

**7. Are there any other issues that need to be addressed? Please be specific.**

**Summary Consideration:**

There were a number of comments raised that presented the SDT with an opportunity to provide additional clarity to a number of items. Therefore, the following requirements have been changed due to industry comments to this question:

**R1.2** An ~~overview~~ summary description of the elements required to support the backup functionality.

**R1.5** A transition period between the loss of primary control center functionality and the time to fully implement the backup functionality that is less than or equal to ~~plan and get backup functionality up and running that is less than~~ two hours.

**R1.6** An Operating Process describing the actions to be taken during the transition period between the loss of primary control center functionality and the time ~~to~~ to fully implement the backup functionality elements identified in Requirement R1.2 ~~get backup functionality up and running~~. The Operating Process shall also include:

**R1.6.2.** Actions to manage the risk to the BES during the transition from primary to backup functionality as well as during outages of the primary ~~or~~ backup functionality.

**R3.** Each Reliability Coordinator, Balancing Authority, and applicable ~~Transmission Operator~~ directing BES operations through other entities shall ensure that backup functionality exists for the BES operations performed through those other entities. ~~include provisions for the loss of such entity's control functionality in its Operating Plan for backup functionality.~~

**R4.** Each Reliability Coordinator shall, ~~during the time period when the primary control center functionality and the backup functionality are both available for use,~~ with certified Reliability Coordinator operators have a backup control center facility (provided through its own dedicated backup facility or at another entity's control center with certified Reliability Coordinator operators) that provides the functionality required for maintaining compliance with all Reliability Standards ~~applicable to the Reliability Coordinator that depend on primary control center functionality.~~ To avoid requiring a tertiary facility, a backup facility is not required during:

**R4.1** Planned outages of the primary or backup facilities of two weeks or less

**R4.2** Unplanned outages of the primary or backup facilities

**R5.** Each Balancing Authority and ~~applicable~~ ~~Transmission Operator~~ shall, ~~during the time period when the primary control center functionality and the backup functionality are both available for use,~~ have backup functionality (provided either through a backup control center facility or contracted services) that includes monitoring, control, logging, and alarming sufficient for maintaining compliance with all Reliability Standards ~~applicable that depend on~~ to a Balancing Authority and Transmission Operator's primary control center functionality respectively. To avoid requiring tertiary functionality, backup functionality is not required during:

**R5.1** Planned outages of the primary or backup functionality of two weeks or less

**R5.2** Unplanned outages of the primary or backup functionality

**R6.1** ~~The~~An update and approval of the Operating Plan for backup functionality shall take place within sixty calendar days of any changes ~~to the backup location, in~~ capabilities described in Requirement R1, or contact information.

**R7.** Each Reliability Coordinator, Balancing Authority, and ~~applicable~~ Transmission Operator shall have primary and backup capability ~~yes~~ that ~~does~~ not depend on ~~the primary control center each other or any single data center~~ for any functionality required to maintain compliance with Reliability Standards that depend on the primary control functionality.

**M1.** Each Reliability Coordinator, Balancing Authority, and ~~applicable~~ Transmission Operator shall have a dated, current, in force Operating Plan for backup functionality in accordance with Requirement R1, in electronic or hardcopy format ~~, with evidence of its last issue, describing the manner in which it ensures reliable operations of the BES in the event that its primary control center becomes inoperable.~~

Organization	Question 7:	Question 7 Comments:
Consumers Energy Company	Yes	This standard is overbearing and requires far more documentation than is needed to maintain reliability and accomplish the goals of adequate back-up facilities. For example, could the annual test be considered the review of the Operating Plan? Is it sufficient documentation that proof a test has been conducted and was successful in operating the system?
<p><b>Response:</b> The SDT is following the FERC directives as outlined in Orders 693 and 693A. The SDT feels that testing of the Operating Plan is required and that R8 clearly describes the testing needed to satisfy the standard.</p>		
Puget Sound Energy	Yes	R.5 needs further clarification as stated in my response to the previous question.R.1.6.2. The definition of "actions to manage risk" is vague. This again points to R.5. If an entity has notified affected entities that it is in the process of transitioning to the back up facility and made notifications to implement the plan, aren't these actions to manage risk to the BES? I am not sure what the SDT had in mind with this requirement.
<p><b>Response:</b> The intent of the drafting team was to provide for the operation of either the primary or backup system individually during periods of emergency, transition, or maintenance without the need for a tertiary backup capability. The SDT has modified R5 to provide clarity on this matter.</p> <p><b>R5.</b> Each Balancing Authority and <del>applicable</del> Transmission Operator shall, <del>during the time period when the primary control center functionality and the backup functionality are both available for use,</del> have backup functionality (provided either through a backup control center facility or contracted services) that includes monitoring, control, logging, and alarming sufficient for maintaining compliance with all Reliability Standards <del>applicable</del> that <del>depend on</del> <del>to</del> a Balancing Authority and Transmission Operator's <u>primary control center functionality</u> respectively. <del>To avoid requiring tertiary functionality, backup functionality is not required during:</del></p>		

Consideration of Comments on 2<sup>nd</sup> Draft of EOP-008-1 — Backup Facilities (Project 2006-04)

Organization	Question 7:	Question 7 Comments:
<p><a href="#">R5.1 Planned outages of the primary or backup functionality of two weeks or less</a></p> <p><a href="#">R5.2 Unplanned outages of the primary or backup functionality</a></p>		
<p>San Diego Gas and Electric</p>	<p>Yes</p>	<p>R5 - We would like to get some clarification on Requirement 5, particularly with respect to the opening sentence that refers to the time period when primary and backup control center functionality is available for use, then the requirement is to have backup functionality. If both primary and backup control centers are available for use, doesn't that automatically mean that backup functionality is available? Please clarify the meaning of this</p> <p>Requirement. R6.1 - We would like further clarification to the term "changes to the backup capabilities" that would require an update and approval of the Operating Plan. What are examples of changes to backup capabilities that would trigger an update of the Operating Plan? What are examples of changes to backup capabilities that are considered more "minor" that wouldn't require an update?</p>
<p><b>Response:</b> R5: The intent of the drafting team was to provide for the operation of either the primary or backup system individually during periods of emergency, transition, or maintenance without the need for a tertiary backup capability. The SDT has modified Requirement R5 to provide clarity on this matter.</p> <p><b>R5.</b> Each Balancing Authority and applicable Transmission Operator shall, <del>during the time period when the primary control center functionality and the backup functionality are both available for use,</del> have backup functionality (provided either through a backup control center facility or contracted services) that includes monitoring, control, logging, and alarming sufficient for maintaining compliance with all Reliability Standards <del>applicable that depend on</del> a Balancing Authority and Transmission Operator's <u>primary control center functionality respectively.</u> <del>To avoid requiring tertiary functionality, backup functionality is not required during:</del></p> <p><a href="#">R5.1 Planned outages of the primary or backup functionality of two weeks or less</a></p> <p><a href="#">R5.2 Unplanned outages of the primary or backup functionality</a></p> <p>R6.1: The SDT clarified Requirement R6.1.</p> <p><b>R6.1</b> <del>The</del> An update and approval of the Operating Plan for backup functionality shall take place within sixty calendar days of any changes <del>to the backup location, in capabilities described in Requirement R1, or contact information.</del></p>		
<p>ComEd / Exelon</p>	<p>Yes</p>	<p>R5 addresses maintaining the backup functionality that includes monitoring, control, logging, and alarming. M5 requires dated evidence (documentation) that you have demonstrated the backup functionality for the requirements in R5. However R8.2 addresses the testing of the backup functionality through actual implementation or test operation for a minimum of two consecutive hours. The requirements of R5 should be incorporated into R8.2 and therefore R5 eliminated as a standalone</p>

Consideration of Comments on 2<sup>nd</sup> Draft of EOP-008-1 — Backup Facilities (Project 2006-04)

Organization	Question 7:	Question 7 Comments:
		<p>requirement. As it is currently written in draft 2, R5 &amp; R8.2 are redundant and M5 &amp; M8 are redundant in terms of practical application and verification of compliance.</p>
<p><b>Response:</b> The SDT does not feel a need to integrate Requirement R5 with Requirement R8 because they are not redundant. Requirement R5 deals with required functionality and R8 deals with testing that functionality. They are two separate requirements.</p>		
<p>Entergy System Planning &amp; Operations (Generation &amp; Marketing)</p>	<p>Yes</p>	<p>The use of the term "control center" needs definition and align with that which will be used in the CIP critical asset identification methodology. The terms "primary" and "back up" control center or functionality should also be defined.</p> <p>R1.1 the use of the term "prolonged" is subjective and should be revised to identify a definite period of time.</p> <p>R1.2.4 the actual power supply requirements should go here. BAL-005 R15 regarding back up power supplies should be revised and transplanted to this standard. consider consulting with the BACSDT on moving and enhancing this requirement.</p> <p>R1.3 is vague - "Keeping consistent" may be redundant to the requirements already listed unless it is intended to mean something else. if so, be specific.</p> <p>R4 &amp; 5 both contain the phrase "during the time when the primary control center functionality and the backup functionality are both available for use". what is the intent of this phrase. Does this mean that the remainder of the requirement does not apply if both are not available for use? Recommend removing this phrase from both requirements.</p> <p>R6.1 should apply only to changes that are related to Reliability Standards or other items specifically identified. Otherwise even very minor changes (such as corporate related features) would be subject to this requirement even though there is no reliability impact.</p> <p>R8. the term "annual" needs better definition in this standard or within the NREC Standards. Does annual mean every calendar year, or every 12 months?</p> <p>R8.3 should simply state "Test results shall be documented.". Lessons learned, etc are related to corporate and industry practices and are not part of reliability standards, otherwise there would need to be an entire standard for a corrective action process.</p> <p>R9 is not needed. The way this standard is written, there is NO allowable outage time permitted on either the primary or back up control center. As soon as one is unavailable the entity is immediately non-compliant. For an entity to continue to operate in non-compliance would be a significant exposure to penalties. What this standard really needs are requirements that describe the allowable outage time on the primary and back up control centers. The reality is that at some point every entity will need to disable one of their facilities so that maintenance can be conducted (whether it be planned or unplanned). Consider adding provisions for short term planned and unplanned outages on either the primary or back up control center.</p>

Consideration of Comments on 2<sup>nd</sup> Draft of EOP-008-1 — Backup Facilities (Project 2006-04)

Organization	Question 7:	Question 7 Comments:
		<p>This would be similar to outage "time clocks" in the nuclear world. This would allow entities to make repairs and upgrades on the primary and back up control centers without automatically being non-compliant when conducting such activities.</p>
<p><b>Response:</b> The primary control center is the facility normally used and the backup control center is used when the primary center becomes inoperable. The SDT does not see a contradiction between EOP-008-1 and the CIP standards. No change made.</p> <p>"Prolonged" is the term used by FERC in Order 693 and was defined there as "generally defined by the time it takes to restore the primary control center".</p> <p>R1.2.4: BAL-005, R15 requires adequate and reliable power supplies to ensure uninterrupted operation of AGC. EOP-008 requires the backup operating plan to describe the power supply used to support the backup facility. The SDT does not feel a need to make changes to either standard.</p> <p>R1.3: The intent of this sub-requirement is to keep the functionality used at the backup facility up to date with that used at the primary center.</p> <p>R4 &amp; 5: The intent of the drafting team was to provide for the operation of either the primary or backup system individually during periods of emergency, transition, or maintenance without the need for a tertiary backup capability. The SDT has modified Requirements R4 &amp; R5 to provide clarity on this matter.</p> <p><b>R4.</b> Each Reliability Coordinator shall, <del>during the time period when the primary control center functionality and the backup functionality are both available for use,</del> have a backup control center facility (provided through its own dedicated backup facility or at another entity's control center <u>with certified Reliability Coordinator operators</u>) that provides the functionality required for maintaining compliance with all Reliability Standards <del>applicable to the Reliability Coordinator that depend on primary control center functionality.</del> <u>To avoid requiring a tertiary facility, a backup facility is not required during:</u></p> <p><b>R4.1</b> <u>Planned outages of the primary or backup facilities of two weeks or less</u></p> <p><b>R4.2</b> <u>Unplanned outages of the primary or backup facilities</u></p> <p><b>R5.</b> Each Balancing Authority and <del>applicable</del> Transmission Operator shall, <del>during the time period when the primary control center functionality and the backup functionality are both available for use,</del> have backup functionality (provided either through a backup control center facility or contracted services) that includes monitoring, control, logging, and alarming sufficient for maintaining compliance with all Reliability Standards <del>applicable that depend on</del> <u>to a Balancing Authority and Transmission Operator's primary control center functionality respectively.</u> <u>To avoid requiring tertiary functionality, backup functionality is not required during:</u></p> <p><b>R5.1</b> <u>Planned outages of the primary or backup functionality of two weeks or less</u></p> <p><b>R5.2</b> <u>Unplanned outages of the primary or backup functionality.</u></p> <p>R6.1: The SDT has modified Requirement R6.1 for clarity.</p> <p><b>R6.1</b> <del>The</del> <u>An</u> update and approval of the Operating Plan for backup functionality shall take place within sixty calendar days of any changes <del>to the backup location, in capabilities described in Requirement R1, or contact information.</del></p>		

Consideration of Comments on 2<sup>nd</sup> Draft of EOP-008-1 — Backup Facilities (Project 2006-04)

Organization	Question 7:	Question 7 Comments:
<p>R8: As the standard is written the annual test could be performed at any point during that year, not just within twelve months of the previous year's test</p> <p>R8.3: The requirement has been deleted.</p> <p>R9: The SDT has modified the wording to Requirements R4 &amp; R5 to address this concern. See above.</p>		
<p>Sierra Pacific Power Co. (dba NV Energy)</p>	<p>Yes</p>	<p>In R1.3, a requirement is made to have a process for keeping the backup functionality "consistent" with the primary control center. The word "consistent" will be subject to much interpretation. Backup Control Centers inherently carry somewhat less functionality than the primary centers even though they may satisfy all of the compliance requirements with the Reliability Standards.</p> <p>In R2, we suggest a change in the language to say "...shall have its Operating Plan for backup functionality available to its System Operators at its primary control center?" This would allow for the use of electronic document management, as many entities have moved away from the tedious chore of maintaining hard-copy procedures in their control centers and should not be found non-compliant for using a progressive electronic document management solution.</p> <p>R3: It is unclear what is meant by directing BES operations through other entities, and what would constitute including "provisions for loss of those entities' control functionality". If for example, we direct BES operations through issuing switching instructions to a TO entity in our balancing area, do we become responsible for the loss of that TO's primary control center under this language? If this is the implication, we believe this Requirement is inappropriate.</p> <p>R4/R5: Why is there a conditional statement present in these Requirements ("...shall, during the time period when the primary control center functionality and the backup functionality are both available for use,...)? This literally states that this Requirement is inactive upon loss of the primary control center. After reading it several times, we continue to be unclear about the intent of that conditional statement.</p> <p>R6: We don't believe it is reasonable to require entities to update, approve, and keep necessary documentation for minor changes to backup facility plans for items such as "contact information". Phone numbers, fax, cell numbers, etc are all relatively dynamic, and should lie below the threshold of providing full plan updates. Perhaps this update/approval is needed for material changes to the Plan, Process or notification protocols, but minor, insignificant edits should not require this degree of documentation.</p> <p>R7: This specifies that the backup capability shall not depend on the "primary control center" for functionality to maintain compliance with the Standards. This is where much interpretation may arise. Most backup control facilities will have a fully redundant EMS computer, but it may depend on SCADA information that passes through the building which houses the primary control center. Such communications are outside the primary control center, yet in the same facility. Would this situation constitute a "dependency upon the primary control center, and if so, is the intent of this Requirement to expand beyond the confines of the "Primary Control Center" itself?</p>

Consideration of Comments on 2<sup>nd</sup> Draft of EOP-008-1 — Backup Facilities (Project 2006-04)

Organization	Question 7:	Question 7 Comments:
		<p>R8.3: We suggest that it is unnecessary to document and incorporate into subsequent Plan revisions items that are characterized as "lessons learned". We should always be learning from test results and improving plans and processes, but as a compliance requirement, we believe this is onerous. Suggest replacement of the term "lessons learned" with "deficiencies", such that it reads "Test results shall be documented and deficiencies noted and incorporated in subsequent revisions of the Operating Plan for backup functionality".</p>
		<p><b>Response:</b> R1.3: intent of this sub-requirement is to keep the functionality used at the backup facility up to date with that used at the primary center.</p> <p>R2: Measure M2 specifically allows for an electronic copy. No change made.</p> <p>R3: The SDT has modified the wording of Requirement R3 to make it clear that the responsible entity must ensure that all entities with BES switching capability have backup functionality.</p> <p><b>R3.</b> Each <u>Reliability Coordinator, Balancing Authority, and applicable</u> Transmission Operator directing BES operations through other entities shall <u>ensure that backup functionality exists for the BES operations performed through those other entities.</u> <del>include provisions for the loss of such entity's control functionality in its Operating Plan for backup functionality.</del></p> <p>R4 &amp; 5: The intent of the drafting team was to provide for the operation of either the primary or backup system individually during periods of emergency, transition, or maintenance without the need for a tertiary backup capability. The SDT has modified Requirements R4 &amp; R5 to provide clarity on this matter.</p> <p><b>R4.</b> Each Reliability Coordinator shall, <del>during the time period when the primary control center functionality and the backup functionality are both available for use,</del> have a backup control center facility (provided through its own dedicated backup facility or at another entity's control center <u>with certified Reliability Coordinator operators</u>) that provides the functionality required for maintaining compliance with all Reliability Standards <del>applicable to the Reliability Coordinator that depend on primary control center functionality.</del> <u>To avoid requiring a tertiary facility, a backup facility is not required during:</u></p> <p><b>R4.1</b> <u>Planned outages of the primary or backup facilities of two weeks or less.</u></p> <p><b>R4.2</b> <u>Unplanned outages of the primary or backup facilities.</u></p> <p><b>R5.</b> Each Balancing Authority and <del>applicable</del> Transmission Operator shall, <del>during the time period when the primary control center functionality and the backup functionality are both available for use,</del> have backup functionality (provided either through a backup control center facility or contracted services) that includes monitoring, control, logging, and alarming sufficient for maintaining compliance with all Reliability Standards <del>applicable that depend on</del> <u>to</u> a Balancing Authority and Transmission Operator's <u>primary control center functionality</u> respectively. <del>To avoid requiring tertiary functionality, backup functionality is not required during:</del></p> <p><b>R5.1</b> <u>Planned outages of the primary or backup functionality of two weeks or less</u></p> <p><b>R5.2</b> <u>Unplanned outages of the primary or backup functionality</u></p>

Consideration of Comments on 2<sup>nd</sup> Draft of EOP-008-1 — Backup Facilities (Project 2006-04)

Organization	Question 7:	Question 7 Comments:
		<p>R6: The SDT agrees and contact information has been deleted.</p> <p>R6.1 <del>The</del>An update and approval of the Operating Plan for backup functionality shall take place within sixty calendar days of any changes <del>to the backup location, in capabilities described in Requirement R1, or contact information.</del></p> <p>R7: The intent is that if the primary control center is destroyed, the backup facility will be capable of collecting the data needed to support the reliable operation of the BES.</p> <p>R8.3: The requirement has been deleted.</p>
Progress Energy Carolinas, Inc.	Yes	<p>R5 — Compliance with all Reliability Standards should not be required immediately upon transition to the backup. The focus at immediate transition must be solely upon standards directly-related to essential BES reliability. This is evidenced within this standard by choosing an annual test only lasting 2 hours, which will only verify the basic functionalities of SCADA, alarming, voice &amp; data communications, AGC, state estimator and contingency analysis. The requirement to immediately meet all standards causes undue time/finances to be spent on hot-backup technology for non-essential functions, and thus decreases attention to essential functions. Non-essential standard requirements such as inadvertent/interchange check-outs, TTC/ATC postings, transaction tagging, etc should be identified, and a longer transition requirement specified, such as 48 hours.</p> <p>R7 — How does this apply to a situation where primary EMS or voice communication equipment resides in a facility geographically separate from the primary center’s control room? Does the phrase “does not depend on the primary control center” refer to the control room facility only, or does it also apply to the facility housing EMS/voice communication equipment? What distinguishes equipment for compliance to this standard versus CIP-009-1?</p>
Progress Energy-Florida	Yes	<p>R5 — Compliance with all Reliability Standards should not be required immediately upon transition to the backup. The focus at immediate transition must be solely upon standards directly-related to essential BES reliability. This is evidenced within this standard by choosing an annual test only lasting 2 hours, which will only verify the basic functionalities of SCADA, alarming, voice &amp; data communications, AGC, state estimator and contingency analysis. The requirement to immediately meet all standards causes undue time/finances to be spent on hot-backup technology for non-essential functions, and thus decreases attention to essential functions. Non-essential standard requirements such as inadvertent/interchange check-outs, TTC/ATC postings, transaction tagging, etc should be identified, and a longer transition requirement specified, such as 48 hours.</p> <p>R7 — How does this apply to a situation where primary EMS or voice communication equipment resides in a facility geographically separate from the primary center’s control room? Does the phrase “does not depend on the primary control center” refer to the control room facility only, or does it also apply to the facility housing EMS/voice communication</p>

Consideration of Comments on 2<sup>nd</sup> Draft of EOP-008-1 — Backup Facilities (Project 2006-04)

Organization	Question 7:	Question 7 Comments:
		equipment? What distinguishes equipment for compliance to this standard versus CIP-009-1?
<p><b>Response:</b></p> <p><b>R5:</b> Requirement R1.2 requires the plan to provide a summary description of the elements necessary to support the backup functionality. Requirement R1.6 requires the plan to provide a description of the actions to be taken during the transition period. The SDT did not intend to require a manned hot backup facility for BA's or TOP's.</p> <p><b>R7:</b> The SDT has re-written the requirement to address these concerns and does not believe that presents a contradiction with CIP-009-1.</p> <p><b>R7.</b> Each Reliability Coordinator, Balancing Authority, and <del>applicable</del> Transmission Operator shall have <u>primary and backup capability</u> <del>ies</del> that <del>does</del> not depend on <del>the primary control center</del> <u>each other or any single data center</u> for any functionality required to maintain compliance with Reliability Standards <u>that depend on the primary control functionality</u>.</p>		
NPCC	Yes	<p><b>R3:</b> It stipulates that "Each applicable Transmission Operator directing BES operations through other entities shall include provisions for the loss of such entity's control functionality in its Operating Plan for backup functionality." We do not agree that this requirement applies to the TOP only. There might well be situations that an RC or a BA directs it operations through other entities as well. We suggest the requirement to also include the RC and the BA by rewording to: "Each Reliability Coordinator, Balancing Authority and applicable Transmission Operator directing BES operations?"</p> <p><b>R4:</b> We are not sure why the condition: "...during the time period when the primary control center functionality and the backup functionality are both available for use..." is included since having both control center functionalities available for use suffice to meet the condition for: "?have a backup control center facility (provided through its own dedicated backup facility or at another entity's control center) that provides the functionality required for maintaining compliance with all Reliability Standards applicable to the Reliability Coordinator." If the intent of this requirement is to ensure the functionality works, then the requirements should simply stipulate such a demonstration. In fact, the intent of R8 is to ensure that the backup capability is functional when called upon. We therefore hold the view that R4 (and R5) is not needed, be eliminated, and include the required clarifications in the Measures Section.</p> <p><b>R5:</b> Please see our comments on R4. We do not think R5 is needed. If retained, the wording should be changed to require a demonstration of the backup capability's functionality.</p> <p><b>R7:</b> We do not see the need for this to be a stand alone requirement. This requirement can be included as one of the sub-requirement in R1, or even combined with R1.3.</p>
<p><b>Response:</b> R3: The SDT agrees that this requirement should be extended.</p> <p><b>R3.</b> Each Reliability Coordinator, Balancing Authority, and <del>applicable</del> Transmission Operator directing BES operations through other entities shall <u>ensure that</u></p>		

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Organization	Question 7:	Question 7 Comments:
		<p><del>backup functionality exists for the BES operations performed through those other entities. include provisions for the loss of such entity's control functionality in its Operating Plan for backup functionality.</del></p> <p>R4 &amp; 5: The intent of the drafting team was to provide for the operation of either the primary or backup system individually during periods of emergency, transition, or maintenance without the need for a tertiary backup capability. The SDT has modified Requirements R4 &amp; R5 to provide clarity on this matter.</p> <p><del>R4. Each Reliability Coordinator shall, during the time period when the primary control center functionality and the backup functionality are both available for use,</del> have a backup control center facility (provided through its own dedicated backup facility or at another entity's control center <u>with certified Reliability Coordinator operators</u>) that provides the functionality required for maintaining compliance with all Reliability Standards <del>applicable to the Reliability Coordinator that depend on primary control center functionality.</del> To avoid requiring a tertiary facility, a backup facility is not required during:-</p> <p><u>R4.1 Planned outages of the primary or backup facilities of two weeks or less</u></p> <p><u>R4.2 Unplanned outages of the primary or backup facilities</u></p> <p><del>R5. Each Balancing Authority and applicable Transmission Operator shall, during the time period when the primary control center functionality and the backup functionality are both available for use,</del> have backup functionality (provided either through a backup control center facility or contracted services) that includes monitoring, control, logging, and alarming sufficient for maintaining compliance with all Reliability Standards <del>applicable that depend on</del> <u>to a Balancing Authority and Transmission Operator's primary control center functionality respectively.</u> To avoid requiring tertiary functionality, backup functionality is not required during:</p> <p><u>R5.1 Planned outages of the primary or backup functionality of two weeks or less</u></p> <p><u>R5.2 Unplanned outages of the primary or backup functionality</u></p> <p>R7. The SDT believes that this is a standalone requirement as Requirement R1 covers the plan and Requirement R7 the capabilities. However, Requirement R7 has been re-written to provide additional clarity as to what was the intent of the SDT.</p> <p><del>R7. Each Reliability Coordinator, Balancing Authority, and applicable Transmission Operator shall have primary and backup capabilities that does not depend on the primary control center each other or any single data center for any functionality required to maintain compliance with Reliability Standards that depend on the primary control functionality.</del></p>
Southern Company Transmission	Yes	<p>**In reference to the Applicability Section 4.1, the following recommendation on the format is suggested:4.1.2 Transmission Operators that operate Facilities defined below:</p> <p>4.1.2.1 Facilities operated at 200 kV or above</p> <p>4.1.2.2 Non-radial Facilities operated at 100 kV 4.1.2.3 Facilities demonstrated by the Regional Entity to be critical to the reliability of the Bulk Electric System (BES)In addition to the format change noted above, there could be a misinterpretation with use of the term 'critical' in this standard considering its significance to CIP-002? We suggest you consider the terms</p>

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Organization	Question 7:	Question 7 Comments:
		<p>crucial, important, etc. as an alternative word for critical.</p> <p>**With respect to R1.1, an Operating Plan should include the location for providing backup functionality. There is a concern with how much specificity is required. If the Operating Plan becomes available to the public, the inclusion of the detailed location of a backup control center may unnecessarily create exposure to CEII information.</p> <p>**Requirement R1.1 does not clarify the meaning of “prolonged period of time.” It is not clear if this means eight days or eight months for example. Should there be some correlation to Requirement R9, which provides that six months is the threshold for notifying the Regional Entity about restoration efforts?</p> <p>**The standard should consistently group sub-requirements under each of the relevant components ? Operating Plan, Operating Procedure, and Operating Process. As written, the arrangement is too scattered. Note the order of the requirements and how they are grouped: Requirements R1.1, R1.2, R1.5, and R1.7 correlate to the Operating Plan; Requirements R1.3 and R1.6 correlate to the Operating Process; and Requirement R1.4 correlates to Operating Procedures. The following recommendations ensure more consistency:(a) Insert R1.7 after R1.2 since R1.7 addresses identification of roles for the Operating Plan. It should not be the last item.</p> <p>**R1.5 should be put under R1.6 as a sub-requirement. Also reword the requirement to say The transition period between the loss of primary control center functionality and the time to fully implement the backup plan and get backup functionality up and running must not exceed two hours.</p> <p>**Under R3, it is unclear as to what the requirement is stating. Are you saying that a registered entity that is relying entirely on other entities to perform the TOP function is also responsible for making sure their Operating Plan provides provisions for the loss of each of the other entities' control functionality? Are there such "Pseudo TOPs" out there that this describes? Clarification would be good for Industry.</p>
<p><b>Response:</b> Based on your comment and many others, the SDT has decided to remove all qualifying language from 4.1.2 and list only “Transmission Operator.” We believe, and in addition are convinced by comments received, that the NERC “Statement of Compliance Registry Criteria (Revision 5.0)” and Section 501 (specifically Section 501 1.2.3) of the NERC Rules of Procedure satisfactorily addresses which entities should be registered as a TOP, and therefore, subject to the applicable provisions of this standard. The standards drafting process is not the appropriate venue for addressing inconsistency issues regarding the REs. This should be addressed directly with the REs, or if necessary, with NERC or FERC.</p> <p><del>4.1.2 Transmission Operator operating Facilities at 200 kV or above, or non-radial Facilities above 100 KV, or Facilities demonstrated by the Regional Entity to be critical to the reliability of the Bulk Electric System (BES).</del></p> <p>R1.1: a.: The SDT does not consider Operating Plans to be public material.</p>		

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Organization	Question 7:	Question 7 Comments:
		<p>b.: "Prolonged" is the term used by FERC in Order 693 and was defined there as "generally defined by the time it takes to restore the primary control center"</p> <p>The SDT does not plan to reorganize the standard format as it would not add any clarity at this time.</p> <p>R1.5 The SDT has re-worded R1.5 for clarity.</p> <p><u>R1.5</u> A transition period between the loss of primary control center functionality and the time to fully implement the backup <u>functionality that is less than or equal to plan and get backup functionality up and running that is less than two hours.</u></p> <p>R3 has been re-written to provide clarity surrounding the SDT's intent.</p> <p><u>R3.</u> Each <u>Reliability Coordinator, Balancing Authority, and applicable</u> Transmission Operator directing BES operations through other entities shall <u>ensure that backup functionality exists for the BES operations performed through those other entities.</u> <del>include provisions for the loss of such entity's control functionality in its Operating Plan for backup functionality.</del></p>
Xcel Energy	Yes	<p>R1.5 Please clarify what you mean by "fully implement" and "get backup functionality up and running". As written, this requirement is too vague. Related to R1.5, please modify M1 to include clarifying language such as "functionality required for maintaining compliance".R1.2.1 Please clarify what is meant by "visualization capabilities". This statement is too vague and leaves too much room for interpretation.</p> <p>R1.3 Please clarify what is meant by "consistent". What processes need to be covered? This requirement is too vague and general, which leaves too much room for interpretation.R1.6 Please clarify/outline what minimum actions are required during the transition period.</p> <p>R1.6.2 To be more clear, we recommend changing "risk" to "impact".</p> <p>R5 As drafted, this requirement implies that both the primary and backup control centers have to be in operation at the same time. This is not practical, as only one control center can communicate with the RTUs. This requirement should be reworded.</p> <p>R6.1 Strike "contact information". This is not necessary to include in the requirement.</p> <p>R8.2 Testing for a minimum of 2 continuous hours is unnecessary and problematic b/c we would lose accounting data which affects our CPS reporting data. A minimum test of 30 minutes is reasonable and sufficient. Please either modify to 30 minutes or provide a factual basis for the 2 hours.</p>
		<p><b>Response:</b> R1.5: The intent is to define the transition period as the time from the loss of the primary control center to the time the operator at the backup location can perform monitoring and control. Measure M1 was re-written to provide greater clarity.</p> <p><u>R1.5</u> A transition period between the loss of primary control center functionality and the time to fully implement the backup <u>functionality that is less than or equal</u></p>

Organization	Question 7:	Question 7 Comments:
		<p><del>to plan and get backup functionality up and running that is less than two hours.</del></p> <p><b>M1.</b> Each Reliability Coordinator, Balancing Authority, and <del>applicable</del> Transmission Operator shall have a dated, current, in force Operating Plan for backup functionality in accordance with Requirement R1, in electronic or hardcopy format, <del>with evidence of its last issue, describing the manner in which it ensures reliable operations of the BES in the event that its primary control center becomes inoperable.</del></p> <p>R1.2. 1: All facilities needed to display required operational information are considered visualization capabilities.</p> <p>R1.3: The intent of this sub-requirement is to keep the functionality used at the backup facility up to date with that used at the primary center.</p> <p>R1.6 The SDT has re-written this requirement to provide greater clarity.</p> <p><b>R1.6</b> An Operating Process describing the actions to be taken during the transition period between the loss of primary control center functionality and the time <del>to fully implement the backup functionality elements identified in Requirement R1.2</del> <del>get backup functionality up and running.</del> The Operating Process shall <u>also include:</u></p> <p>R1.6.2: The SDT believes that managing risk is a broader term and more appropriate for this requirement.</p> <p>R4/5: The intent of the drafting team was to provide for the operation of either the primary or backup system individually during periods of emergency, transition, or maintenance without the need for a tertiary backup capability. The SDT has modified Requirements R4 &amp; R5 to provide clarity on this matter.</p> <p><b>R4.</b> Each Reliability Coordinator shall, <del>during the time period when the primary control center functionality and the backup functionality are both available for use,</del> have a backup control center facility (provided through its own dedicated backup facility or at another entity's control center <u>with certified Reliability Coordinator operators</u>) that provides the functionality required for maintaining compliance with all Reliability Standards <del>applicable to the Reliability Coordinator that depend on primary control center functionality.</del> <u>To avoid requiring a tertiary facility, a backup facility is not required during:</u></p> <p><b>R4.1</b> <u>Planned outages of the primary or backup facilities of two weeks or less</u></p> <p><b>R4.2</b> <u>Unplanned outages of the primary or backup facilities</u></p> <p><b>R5.</b> Each Balancing Authority and <del>applicable</del> Transmission Operator shall, <del>during the time period when the primary control center functionality and the backup functionality are both available for use,</del> have backup functionality (provided either through a backup control center facility or contracted services) that includes monitoring, control, logging, and alarming sufficient for maintaining compliance with all Reliability Standards <del>applicable that depend on</del> <u>to a Balancing Authority and Transmission Operator's primary control center functionality respectively.</u> <u>To avoid requiring tertiary functionality, backup functionality is not required during:</u></p> <p><b>R5.1</b> <u>Planned outages of the primary or backup functionality of two weeks or less</u></p> <p><b>R5.2</b> <u>Unplanned outages of the primary or backup functionality</u></p>

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Organization	Question 7:	Question 7 Comments:
		<p>R6.1: The SDT clarified Requirement R6.1.</p> <p><del>R6.1 The An update and approval of the Operating Plan for backup functionality shall take place within sixty calendar days of any changes to the backup location, in capabilities described in Requirement R1, or contact information.</del></p> <p>R8.2: The SDT wanted the test to run across an hour boundary to ferret out exactly these types of problems which need to be fixed in order to be compliant.</p>
<p>Entergy Services, Inc</p>	<p>Yes</p>	<p>The terminology in R1.1 "for a prolonged period of time" is too vague. Please be more specific.</p> <p>The TOP situation indicated in R3 is unclear. What is the arrangement of a TOP directing BES operations through other entities? Is it envisioned that the TOP might be using, say, the RCs control center to run the TOP's BES? Please change the language so the applicability of this requirement is obvious.</p> <p>The rewording of R4 and R5 is confusing. Instead of trying to include all the ideas into one sentence, it would be better and more clear to include a couple of separate sentences.</p> <p>For instance, we suggest for R4, and similar wording for R5:"</p> <p>R4. Each Reliability Coordinator shall have a backup control center facility that provides the functionality required for maintaining compliance with all Reliability Standards applicable to the Reliability Coordinator. This functionality may be provided through its own dedicated backup facility or at another entity's control center. If the loss of the primary or backup capability has already been experienced, a second backup facility is not immediately necessary, i.e., double redundancy is not necessary."</p>
<p><b>Response:</b> "Prolonged" is the term used by FERC in Order 693 and was defined there as "generally defined by the time it takes to restore the primary control center"</p> <p>R3 has been re-written to provide clarity surrounding the SDT's intent.</p> <p><del>R3. Each Reliability Coordinator, Balancing Authority, and applicable Transmission Operator directing BES operations through other entities shall ensure that backup functionality exists for the BES operations performed through those other entities. include provisions for the loss of such entity's control functionality in its Operating Plan for backup functionality.</del></p>		
<p>R4 &amp; 5: The intent of the drafting team was to provide for the operation of either the primary or backup system individually during periods of emergency, transition, or maintenance without the need for a tertiary backup capability. The SDT has modified Requirements R4 &amp; R5 to provide clarity on this matter.</p> <p><del>R4. Each Reliability Coordinator shall, during the time period when the primary control center functionality and the backup functionality are both available for use, have a backup control center facility (provided through its own dedicated backup facility or at another entity's control center with certified Reliability Coordinator operators) that provides the functionality required for maintaining compliance with all Reliability Standards applicable to the Reliability Coordinator</del></p>		

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Organization	Question 7:	Question 7 Comments:
		<p><u>that depend on primary control center functionality. To avoid requiring a tertiary facility, a backup facility is not required during:</u></p> <p><u>R4.1 Planned outages of the primary or backup facilities of two weeks or less.</u></p> <p><u>R4.2 Unplanned outages of the primary or backup facilities.</u></p> <p><u>R5. Each Balancing Authority and applicable-Transmission Operator shall, <del>during the time period when the primary control center functionality and the backup functionality are both available for use,</del> have backup functionality (provided either through a backup control center facility or contracted services) that includes monitoring, control, logging, and alarming sufficient for maintaining compliance with all Reliability Standards <del>applicable- that depend on</del> <u>to</u> a Balancing Authority and Transmission Operator's primary control center functionality respectively. <u>To avoid requiring tertiary functionality, backup functionality is not required during:</u></u></p> <p><u>R5.1 Planned outages of the primary or backup functionality of two weeks or less.</u></p> <p><u>R5.2 Unplanned outages of the primary or backup functionality.</u></p>
Duke Energy	Yes	<p>Detailed edits - see revisions in CAPS below:</p> <p>R1 - Each Reliability Coordinator, Balancing Authority, and applicable Transmission Operator shall have an Operating Plan describing the manner in which it ensures reliable operations of the BES in the event that its primary control center FUNCTIONALITY becomes inoperable. This Operating Plan for backup functionality shall include the following at a minimum:</p> <p>R1.1 - The location and method of implementation for providing backup functionality for a prolonged period of time, AS DEFINED BY THE OPERATING PLAN.</p> <p>R1.2.5 - Physical and cyber security. SDT SHOULD DELETE THIS REQUIREMENT SINCE IT IS COVERED IN THE CIP STANDARDS REQUIREMENTS.</p> <p>R1.3 - An Operating Process for keeping the backup functionality consistent with the primary control center FUNCTIONALITY.</p> <p>R3 - Question : What is an entity? More importantly, what is NOT an entity?</p> <p>R4 and R5 - COMBINE THESE TWO REQUIREMENTS INTO ONE AS FOLLOWS: "Each Reliability Coordinator, Balancing Authority and applicable Transmission Operator shall, during the time period when the primary control center functionality and the backup functionality are both available for use, have backup functionality (such as monitoring, control, logging and alarming) needed to maintain compliance with all applicable Reliability Standards".</p>

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Organization	Question 7:	Question 7 Comments:
		<p>R6.1 - The update and approval of the Operating Plan for backup functionality shall take place within sixty calendar days of any changes to the backup FUNCTIONALITY AS DEFINED IN R1.2.</p> <p>R7 - Each Reliability Coordinator, Balancing Authority, and applicable Transmission Operator shall have backup FUNCTIONALITY that does not depend on the primary control center for any functionality required to maintain compliance with Reliability Standards.</p> <p>R9 - Each Reliability Coordinator, Balancing Authority, and applicable Transmission Operator that has experienced a loss of its primary or backup FUNCTIONALITY and that anticipates that the loss of primary or backup FUNCTIONALITY will last for more than six calendar months, shall provide a plan to its Regional Entity within six calendar months of the date when the functionality is lost, showing how it will re-establish backup FUNCTIONALITY.</p> <p>M1 - Each Reliability Coordinator, Balancing Authority, and applicable Transmission Operator shall have a dated, current, in force Operating Plan for backup functionality in accordance with Requirement R1, in electronic or hardcopy format, with evidence of its last issue, describing the manner in which it ensures reliable operations of the BES in the event that its primary control center FUNCTIONALITY becomes inoperable.</p> <p>M4/M5 - Language needs to match exclusions included in R4/R5. Same clean up as noted in R4/R5 comments above M7 - See comment on R7 above M9 - See comment on R9 above</p>
<p><b>Response:</b> R1 &amp; R1.3: The intent of the standard is to have backup capability for loss of the PCC including all facilities and functionality. Therefore, the SDT sees no need for a wording change.</p> <p>R1.1: The proposed wording is redundant. Therefore, the SDT feels there is no need to change the wording.</p> <p>R1.2.5: The SDT feels this should be part of the Operating Plan even if reference is made to another document.</p> <p>R3: An “entity” is the term used in the NERC functional model.</p> <p>R4 &amp; 5: Because the backup requirement is different for RC and BA/TOP it is necessary to have two requirements that address the differences.</p> <p>R6.1: The SDT has made a change to provide clarity.</p> <p><b>R6.1</b> <del>The</del>An update and approval of the Operating Plan for backup functionality shall take place within sixty calendar days of any changes <del>to the backup location, in capabilities described in Requirement R1, or contact information.</del></p> <p>R7: The proposed wording doesn’t seem to change anything. Therefore, the SDT feels there is no need to change the wording.</p> <p>R9: The intent of the standard is to have backup capability for loss of the PCC including all facilities and functionality. Therefore, the SDT sees no need for a</p>		

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Organization	Question 7:	Question 7 Comments:
<p>wording change.</p> <p>M1: The SDT did not change Requirement R1 as suggested so there is no change to Measure M1 for this comment.</p> <p>M4 &amp; M5: It is unclear as to what “exclusions” are referred to so the SDT made no changes.</p> <p>M7: Since no change is made to R7 from this comment, no change is necessary to Measure M7. The SDT believes that Requirement R7 is a standalone requirement as Requirement R1 covers the plan and Requirement R7 the capabilities. However, Requirement R7 has been re-written to provide additional clarity as to what was the intent of the SDT.</p> <p><b>R7.</b> Each Reliability Coordinator, Balancing Authority, and <del>applicable</del> Transmission Operator shall have <u>primary and backup capabilities that does not depend on the primary control center each other or any single data center</u> for any functionality required to maintain compliance with Reliability Standards <u>that depend on the primary control functionality</u>.</p> <p>M9: Since no change is made to Requirement R9 as suggested, no change is necessary to Measure M9.</p>		
<p>Electric Reliability Council of Texas, Inc.</p>	<p>Yes</p>	<p>R1.2: The word "overview" seems to allow a lot of room and the measure (M1) does, too. However, when it comes to audit time, how specific might the auditor think it needs to be?</p> <p>R3: While ERCOT is the registered Transmission Operator in the region, it does not have direct control over the control facilities of all transmission operators and Qualified Scheduling Entities in ERCOT. ERCOT's Protocols and Operating Guides which require those entities to have and maintain backup facilities. Compliance with those requirements is monitored by ERCOT and the Texas Regional Entity. If ERCOT's Operating Plan would be considered to be in compliance based on references to such Protocol and Operating Guide requirements, rather than detailed provisions for each of the other entities, then this requirement is acceptable. Otherwise, it should be revised to accommodate such a method of compliance.</p> <p>R4 and R5: Is this just a way to say that there is no requirement to have a backup to the backup facility in the event that the primary control center functionality is lost? It also seems to say that when both primary and backup are available, the RC, BA and TO have to also have a Backup Control Center Facility. This requirement needs some simplified wording to make its intent more clear. Maybe using more than one sentence would help.</p> <p>R7: Should be part of R1</p> <p>R8.3: add “as necessary” between “incorporated” and “in”</p> <p>R9: Why six months to provide something that should be in place all the time?</p>
<p><b>Response:</b> R1.2: The SDT changed the wording to provide greater clarity.</p> <p><b>R1.2</b> <del>An overview</del> <u>summary description of the elements required to support the backup functionality.</u></p> <p>Requirement R3 has been re-written to provide clarity surrounding the SDT’s intent.</p>		

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Organization	Question 7:	Question 7 Comments:
		<p><b>R3.</b> Each Reliability Coordinator, Balancing Authority, and <del>applicable</del>-Transmission Operator directing BES operations through other entities shall <u>ensure that backup functionality exists for the BES operations performed through those other entities.</u> <del>include provisions for the loss of such entity's control functionality in its Operating Plan for backup functionality.</del></p> <p>R4 &amp; 5: The intent of the drafting team was to provide for the operation of either the primary or backup system individually during periods of emergency, transition, or maintenance without the need for a tertiary backup capability. The SDT has modified Requirements R4 &amp; R5 to provide clarity on this matter.</p> <p><b>R4.</b> Each Reliability Coordinator shall, <del>during the time period when the primary control center functionality and the backup functionality are both available for use,</del> have a backup control center facility (provided through its own dedicated backup facility or at another entity's control center <u>with certified Reliability Coordinator operators</u>) that provides the functionality required for maintaining compliance with all Reliability Standards <del>applicable to the Reliability Coordinator</del> that depend on primary control center functionality. To avoid requiring a tertiary facility, a backup facility is not required during:</p> <p><b>R4.1</b> <u>Planned outages of the primary or backup facilities of two weeks or less</u></p> <p><b>R4.2</b> <u>Unplanned outages of the primary or backup facilities</u></p> <p><b>R5.</b> Each Balancing Authority and <del>applicable</del>-Transmission Operator shall, <del>during the time period when the primary control center functionality and the backup functionality are both available for use,</del> have backup functionality (provided either through a backup control center facility or contracted services) that includes monitoring, control, logging, and alarming sufficient for maintaining compliance with all Reliability Standards <del>applicable that depend on</del> <u>to a Balancing Authority and Transmission Operator's primary control center functionality respectively.</u> To avoid requiring tertiary functionality, backup functionality is not required during:</p> <p><b>R5.1</b> <u>Planned outages of the primary or backup functionality of two weeks or less</u></p> <p><b>R5.2</b> <u>Unplanned outages of the primary or backup functionality</u></p> <p>R7. The SDT believes that this is a standalone requirement as Requirement R1 covers the plan and Requirement R7 the capabilities. However, Requirement R7 has been re-written to provide additional clarity as to what was the intent of the SDT.</p> <p><b>R7.</b> Each Reliability Coordinator, Balancing Authority, and <del>applicable</del>-Transmission Operator shall have <u>primary and backup capabilities that does not depend on the primary control center each other or any single data center</u> for any functionality required to maintain compliance with Reliability Standards <u>that depend on the primary control functionality.</u></p> <p>R8.3: The requirement has been deleted.</p> <p>R9: The reasons for the loss of the PCC are numerous and have an impact on the replacement of the PCC. Therefore, the SDT feels it necessary to give the RC, BA, or TOP time to evaluate the replacement and plan it. Six months seems adequate.</p>
MRO NERC Standards	Yes	R1, Requires that applicable entities have an Operating Plan covering "backup functionality". Then R1.1 uses "backup functionality" as a sub-requirement to R1, without explaining what "backup functionality" is. Would a Balancing Authority's

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Organization	Question 7:	Question 7 Comments:
Review Subcommittee		<p>backup functionality be all NERC requirements assigned to a Balancing Authority? Please define. R1.5, What happens if the applicable entity needs more than two hours to get "backup functionality" running?</p> <p>R1.6.2, Does "as well as during outages of the primary/backup functionality" include SCADA, Energy Managements Systems, etc., updates? Could the SDT clarify the maximum amount of time that updates, patches, maintenance could take place without harming the BES, such as within one hour?</p> <p>R2, states the Operating Plan is required to be " at the location supporting backup functionality". If this is the backup control center, the MRO agrees, if not please clarify.</p> <p>R4, The MRO believes this requirement is redundant and should be removed. The MRO believes that this requirement would put the RC in double jeopardy. Please clarify why R4 is written.</p> <p>R5, The MRO believes this requirement is redundant and should be removed. The MRO believes that this requirement would put the BA &amp; TOP in double jeopardy. Please clarify why R5 is written.</p>
<p><b>Response:</b> R1: Your interpretation is correct.</p> <p>R1.5: If you 'need' more than 2 hours, you would have to discuss the issue with your RE.</p> <p>R1.6.2: The assumption is correct. Also, the SDT has not defined a max time for maintenance because maintenance time depends on the scope of the maintenance required.</p> <p>R2: This can be the backup control center or a backup location where the functionality is contracted.</p> <p>R4 &amp; R5: The SDT does not understand what this would be redundant with as no specificity was provided but changes have been made to Requirements R4 &amp; R5 due to other comments.</p> <p><b>R4.</b> Each Reliability Coordinator shall, <del>during the time period when the primary control center functionality and the backup functionality are both available for use,</del> have a backup control center facility (provided through its own dedicated backup facility or at another entity's control center <u>with certified Reliability Coordinator operators</u>) that provides the functionality required for maintaining compliance with all Reliability Standards <del>applicable to the Reliability Coordinator that depend on primary control center functionality.</del> To avoid requiring a tertiary facility, a backup facility is not required during-;</p> <p><b>R4.1</b> <u>Planned outages of the primary or backup facilities of two weeks or less</u></p> <p><b>R4.2</b> <u>Unplanned outages of the primary or backup facilities</u></p> <p><b>R5.</b> Each Balancing Authority and <del>applicable</del> Transmission Operator shall, <del>during the time period when the primary control center functionality and the backup functionality are both available for use,</del> have backup functionality (provided either through a backup control center facility or contracted services) that includes monitoring, control, logging, and alarming sufficient for maintaining compliance with all Reliability Standards <del>applicable that depend on</del> <u>to</u> a Balancing Authority</p>		

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Organization	Question 7:	Question 7 Comments:
		<p>and Transmission Operator's primary control center functionality respectively. To avoid requiring tertiary functionality, backup functionality is not required during:</p> <p>R5.1 Planned outages of the primary or backup functionality of two weeks or less</p> <p>R5.2 Unplanned outages of the primary or backup functionality</p>
ITC	Yes	<p>Requirement 3 should be re-worded to "Each applicable Transmission Operator "delegating" BES "operational functions to" other entities? At any given time, the TOP may 'direct' any connected GOP or LSE to take an action to support BES operations. As written, this requirement could be interpreted to require the TOP to have the backup plan for all connected GOPs, LSEs, etc. incorporated into their plan. Limiting the scope to those functions which are formally delegated is more appropriate and reasonable.</p> <p>Requirement 4 and 5 should be reworded. The requirement is cumbersome to read and understand. We believe the intent of the phrase "during the time period when the primary control center functionality and the backup functionality are both available for use" is intended to clarify that if you are already at your backup, you are not required to have a second N-2 backup. We suggest you add a sub-requirement that clearly states this exclusion and remove the phrase from the main requirement.</p> <p>Requirement 6 should be a sub-requirement of requirement 1 and requirement 6 and 6.1 should be combined into a single requirement that says the plan must be updated annually OR within 60 days of any significant changes.</p> <p>Requirement 7 is unnecessary and ambiguous. Requirement 1 adequately addresses the specific requirements of the Plan.</p> <p>Requirement 9 should be modified. If extended operation from a backup facility is a real concern to reliability, the RE should not be waiting 6 months to know there is an alternative plan. If it's OK to wait 6 months, this requirement should be removed.</p>
<p><b>Response:</b> R3 has been re-written to provide clarity surrounding the SDT's intent.</p> <p>R3. Each Reliability Coordinator, Balancing Authority, and applicable Transmission Operator directing BES operations through other entities shall ensure that backup functionality exists for the BES operations performed through those other entities. <del>include provisions for the loss of such entity's control functionality in its Operating Plan for backup functionality.</del></p> <p>R4 &amp; 5: The intent of the drafting team was to provide for the operation of either the primary or backup system individually during periods of emergency, transition, or maintenance without the need for a tertiary backup capability. The SDT has modified Requirements R4 &amp; R5 to provide clarity on this matter.</p> <p>R4. Each Reliability Coordinator shall, <del>during the time period when the primary control center functionality and the backup functionality are both available for use,</del> have a backup control center facility (provided through its own dedicated backup facility or at another entity's control center with certified Reliability Coordinator operators) that provides the functionality required for maintaining compliance with all Reliability Standards <del>applicable to the Reliability Coordinator</del></p>		

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Organization	Question 7:	Question 7 Comments:
		<p><u>that depend on primary control center functionality. To avoid requiring a tertiary facility, a backup facility is not required during:</u></p> <p><u>R4.1 Planned outages of the primary or backup facilities of two weeks or less</u></p> <p><u>R4.2 Unplanned outages of the primary or backup facilities</u></p> <p><u>R5. Each Balancing Authority and <del>applicable</del>-Transmission Operator shall, <del>during the time period when the primary control center functionality and the backup functionality are both available for use,</del> have backup functionality (provided either through a backup control center facility or contracted services) that includes monitoring, control, logging, and alarming sufficient for maintaining compliance with all Reliability Standards <del>applicable</del>-that depend on <del>to</del> a Balancing Authority and Transmission Operator's primary control center functionality respectively. <u>To avoid requiring tertiary functionality, backup functionality is not required during:</u></u></p> <p><u>R5.1 Planned outages of the primary or backup functionality of two weeks or less</u></p> <p><u>R5.2 Unplanned outages of the primary or backup functionality</u></p> <p>R6: The SDT feels Requirement R6 should be a separate requirement because it does not deal with the Plan contents. The SDT also feels the sub-requirement details the update and approval requirements and should be separate from the requirement.</p> <p>R7: The intent is that if the primary control center is destroyed, the backup facility will be capable of collecting the data needed to support the reliable operation of the BES.</p> <p>R9: The reasons for the loss of the PCC are numerous and have an impact on the replacement of the PCC. Therefore, the SDT feels it necessary to give the RC, BA, or TOP time to evaluate the replacement and plan it. Six months seems adequate.</p>
Western Area Power Administration	Yes	<p>Requirement #1.6.2; Change "Actions to manage the risk?" to "Actions to manage the impact?"</p> <p>Requirement #3; Please specify the meaning of "?directing BES operations through other entities?" What does through other entities mean?</p> <p>Requirement #5; "during the time period when the primary control center functionality and the backup functionality are both available for use, have backup functionality?" This statement is very vague and implies having two control centers in operation at all times. This sentence needs to be rewritten.</p> <p>Requirement #5; "maintaining compliance with all Reliability Standards?" is too vague. Please specify the Reliability Standards required for compliance.</p> <p>Requirement#6.1; Timing on an updated Operating Plan is vague. A suggestion is to state the updated Operating Plan should be within 12 months from the last update.</p> <p>Requirement #8.3; Lessons learned should not be included in the Operating Plan. A suggestion is to have the lessons</p>

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		learned as evidence resulting from the tests.
		<p><b>Response:</b> R1.6.2: The SDT believes that managing risk is a broader term and more appropriate for this requirement. Requirement R3 has been re-written to provide clarity surrounding the SDT's intent.</p> <p><b>R3.</b> Each Reliability Coordinator, Balancing Authority, and <del>applicable</del> Transmission Operator directing BES operations through other entities shall <u>ensure that backup functionality exists for the BES operations performed through those other entities.</u> <del>include provisions for the loss of such entity's control functionality in its Operating Plan for backup functionality.</del></p> <p>R4 &amp; 5: The intent of the drafting team was to provide for the operation of either the primary or backup system individually during periods of emergency, transition, or maintenance without the need for a tertiary backup capability. The SDT has modified Requirements R4 &amp; R5 to provide clarity on this matter.</p> <p><b>R4.</b> Each Reliability Coordinator shall, <del>during the time period when the primary control center functionality and the backup functionality are both available for use,</del> have a backup control center facility (provided through its own dedicated backup facility or at another entity's control center <u>with certified Reliability Coordinator operators</u>) that provides the functionality required for maintaining compliance with all Reliability Standards <del>applicable to the Reliability Coordinator</del> that depend on primary control center functionality. To avoid requiring a tertiary facility, a backup facility is not required during:</p> <p><b>R4.1</b> <u>Planned outages of the primary or backup facilities of two weeks or less</u></p> <p><b>R4.2</b> <u>Unplanned outages of the primary or backup facilities</u></p> <p><b>R5.</b> Each Balancing Authority and <del>applicable</del> Transmission Operator shall, <del>during the time period when the primary control center functionality and the backup functionality are both available for use,</del> have backup functionality (provided either through a backup control center facility or contracted services) that includes monitoring, control, logging, and alarming sufficient for maintaining compliance with all Reliability Standards <del>applicable that depend on</del> <u>to a Balancing Authority and Transmission Operator's primary control center functionality respectively.</u> To avoid requiring tertiary functionality, backup functionality is not required during:</p> <p><b>R5.1</b> <u>Planned outages of the primary or backup functionality of two weeks or less</u></p> <p><b>R5.2</b> <u>Unplanned outages of the primary or backup functionality</u></p> <p>R6.1: The SDT has made a change to provide clarity.</p> <p><b>R6.1</b> <del>The</del><u>An</u> update and approval of the Operating Plan for backup functionality shall take place within sixty calendar days of any changes <del>to the backup location, in capabilities described in Requirement R1, or contact information.</del></p> <p>R8.3: The requirement has been deleted.</p>
ISO New	Yes	R3: It stipulates that "Each applicable Transmission Operator directing BES operations through other entities shall include

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Organization	Question 7:	Question 7 Comments:
England Inc		<p>provisions for the loss of such entity’s control functionality in its Operating Plan for backup functionality." We do not agree that this requirement applies to the TOP only. There might well be situations that an RC or a BA directs it operations through other entities as well. We suggest the requirement to also include the RC and the BA by rewording to: "Each Reliability Coordinator, Balancing Authority and applicable Transmission Operator directing BES operations?"</p> <p>R4: We are not sure why the condition: "...during the time period when the primary control center functionality and the backup functionality are both available for use..." is included since having both control center functionalities available for use suffice to meet the condition for: "?have a backup control center facility (provided through its own dedicated backup facility or at another entity’s control center) that provides the functionality required for maintaining compliance with all Reliability Standards applicable to the Reliability Coordinator." If the intent of this requirement is to ensure the functionality works, then the requirements should simply stipulate such a demonstration. In fact, the intent of R8 is to ensure that the backup capability is functional when called upon. We therefore hold the view that R4 (and R5) is not needed.</p> <p>R5: Please see our comments on R4. We do not think R5 is needed. If retained, the wording should be changed to require a demonstration of the backup capability's functionality.</p> <p>R7: We do not see the need for this to be a stand alone requirement. This requirement can be included as one of the sub-requirement in R1, or even combined with R1.3.</p>
Hydro-Québec TransÉnergie (HQT)	Yes	<p>R3: It stipulates that "Each applicable Transmission Operator directing BES operations through other entities shall include provisions for the loss of such entity’s control functionality in its Operating Plan for backup functionality." We do not agree that this" requirement applies to the TOP only. There might well be situations that an RC or a BA directs it operations through other entities as well. We suggest the requirement to also include the RC and the BA by rewording to: "Each Reliability Coordinator, Balancing" Authority and applicable Transmission Operator directing BES operations?"</p> <p>R4: We are not sure why the condition: "?during the time period when the primary control center functionality and the backup functionality are both available for use?" is included since having both control center functionalities available for use suffice to meet the condition for: "...have a backup control center facility (provided through its own dedicated backup facility or at another entity’s control center) that provides the functionality required for maintaining compliance with all Reliability Standards applicable to the Reliability Coordinator." If the intent of this requirement is to ensure the functionality works, then the requirements should simply stipulate such a demonstration. In fact, the intent of R8 is to ensure that the backup capability is functional when called upon. We therefore hold the view that R4 (and R5) is not needed, be eliminated, and include the required clarifications in the Measures Section.</p> <p>R5: Please see our comments on R4. We do not think R5 is needed. If retained, the wording should be changed to require a demonstration of the backup capability's functionality. R7: We do not see the need for this to be a stand alone requirement. This requirement can be included as one of the sub-requirement in R1, or even combined with R1.3. In regard to R7, we</p>

Organization	Question 7:	Question 7 Comments:
		<p>would appreciate the SDT to indicate if the EMS system should be doubled also at the Backup facility since R7 specifies that the Backup "does not depend on the primary control center for any functionality required to maintain compliance with Reliability Standards."</p>
<p><b>Response:</b> Requirement R3 has been re-written to provide clarity surrounding the SDT's intent.</p> <p><b>R3.</b> Each <u>Reliability Coordinator, Balancing Authority, and applicable</u> Transmission Operator directing BES operations through other entities shall <u>ensure that backup functionality exists for the BES operations performed through those other entities.</u> <del>include provisions for the loss of such entity's control functionality in its Operating Plan for backup functionality.</del></p> <p>R4 &amp; 5: The intent of the drafting team was to provide for the operation of either the primary or backup system individually during periods of emergency, transition, or maintenance without the need for a tertiary backup capability. The SDT has modified Requirement R4 &amp; R5 to provide clarity on this matter.</p> <p><b>R4.</b> Each Reliability Coordinator shall, <del>during the time period when the primary control center functionality and the backup functionality are both available for use,</del> have a backup control center facility (provided through its own dedicated backup facility or at another entity's control center <u>with certified Reliability Coordinator operators</u>) that provides the functionality required for maintaining compliance with all Reliability Standards <del>applicable to the Reliability Coordinator that depend on primary control center functionality.</del> <u>To avoid requiring a tertiary facility, a backup facility is not required during:</u></p> <p><b>R4.1</b> <u>Planned outages of the primary or backup facilities of two weeks or less</u></p> <p><b>R4.2</b> <u>Unplanned outages of the primary or backup facilities</u></p> <p><b>R5.</b> Each Balancing Authority and <del>applicable</del> Transmission Operator shall, <del>during the time period when the primary control center functionality and the backup functionality are both available for use,</del> have backup functionality (provided either through a backup control center facility or contracted services) that includes monitoring, control, logging, and alarming sufficient for maintaining compliance with all Reliability Standards <del>applicable that depend on</del> <u>to a Balancing Authority and Transmission Operator's primary control center functionality respectively.</u> <del>To avoid requiring tertiary functionality, backup functionality is not required during:</del></p> <p><b>R5.1</b> <u>Planned outages of the primary or backup functionality of two weeks or less</u></p> <p><b>R5.2</b> <u>Unplanned outages of the primary or backup functionality</u></p> <p>R7: Requirement R7 is intended to provide clarity and remove ambiguity as it pertains to implementation of backup control functionality. The SDT believes that the requirement should remain. The SDT believes that this is a standalone requirement as Requirement R1 covers the plan and Requirement R7 the capabilities. Duplicate EMS functionality may be required to ensure no dependency on the primary control center.</p>		

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Organization	Question 7:	Question 7 Comments:
Independent Electricity System Operator	Yes	<p>R3: We have two comments on this Requirement:</p> <p>a. It stipulates that "Each applicable Transmission Operator directing BES operations through other entities shall include provisions for the loss of such entity's control functionality in its Operating Plan for backup functionality." We do not agree that this requirement applies to the TOP only. There might well be situations that an RC or a BA directs its operations through other entities as well. We suggest the requirement to also include the RC and the BA by rewording to: "Each Reliability Coordinator, Balancing Authority and applicable Transmission Operator directing BES operations?"</p> <p>b. We believe the wording is ambiguous in that in some areas/jurisdictions, there are multiple TOPs that one of them direct the operations of the other. For example, an ISO is registered as a TOP while a transmission entity (an owner, for example) within the ISO footprint is also registered as a TOP. The two TOPs perform distinctly different tasks and may even have their tasks and responsibilities clearly stipulated in an agreement, market rule or regional reliability plan. The ISO-TOP directs operations of the transmission-entity-TOP while the latter may be solely responsible for switching operations and maintenance. Both need to have backup capability. The way R3 is worded can be interpreted that the ISO-TOP needs to be responsible for the backup capability of the transmission-entity-TOP. We do not believe this is the intent of R3, and this is not acceptable. To clarify this situation, we suggest R3 to be reworded to: Each applicable Transmission Operator delegating its tasks for BES operations to other entities shall include provisions for the loss of such entity's control functionality in its Operating Plan for backup functionality. In other words, this requirement only applies to a TOP if it delegates it task (for which it is still fully responsible) to another entity.</p> <p>R4: We are not sure why the condition: "...during the time period when the primary control center functionality and the backup functionality are both available for use..." is included since having both control centre functionality available for use suffice to meet the condition for: "...have a backup control center facility (provided through its own dedicated backup facility or at another entity's control center) that provides the functionality required for maintaining compliance with all Reliability Standards applicable to the Reliability Coordinator." If the intent of this requirement is to ensure the functionality works, then the requirements should simple stipulate such a demonstration. In fact, the intent of R8 is to ensure that the backup capability is functional when called upon. We therefore hold the view that R4 (and R5) is not needed.</p> <p>R5: Please see our comments on R4. We do not think R5 is needed. If retained, the wording should be changed to require a demonstration of the backup capability's functionality.</p> <p>R7: We do not see the need for this to be a stand alone requirement. This requirement can be included as one of the sub-requirement in R1, or even combined with R1.3.</p>
<p><b>Response:</b> R3a – Requirement R3 has been re-written to provide clarity surrounding the SDT's intent.</p> <p><b>R3.</b> Each Reliability Coordinator, Balancing Authority, and <del>applicable</del> Transmission Operator directing BES operations through other entities shall ensure that</p>		

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Organization	Question 7:	Question 7 Comments:
		<p><del>backup functionality exists for the BES operations performed through those other entities. include provisions for the loss of such entity's control functionality in its Operating Plan for backup functionality.</del></p> <p>R3b – Each TOP is independently responsible for meeting the standard. Joint registration agreements may have an impact here.</p> <p>R4 &amp; 5: The intent of the drafting team was to provide for the operation of either the primary or backup system individually during periods of emergency, transition, or maintenance without the need for a tertiary backup capability. The SDT has modified Requirements R4 &amp; R5 to provide clarity on this matter.</p> <p><del>R4. Each Reliability Coordinator shall, during the time period when the primary control center functionality and the backup functionality are both available for use,</del> have a backup control center facility (provided through its own dedicated backup facility or at another entity's control center <u>with certified Reliability Coordinator operators</u>) that provides the functionality required for maintaining compliance with all Reliability Standards <del>applicable to the Reliability Coordinator</del> that depend on primary control center functionality. To avoid requiring a tertiary facility, a backup facility is not required during:-</p> <p><u>R4.1 Planned outages of the primary or backup facilities of two weeks or less</u></p> <p><u>R4.2 Unplanned outages of the primary or backup facilities</u></p> <p><del>R5. Each Balancing Authority and applicable-Transmission Operator shall, during the time period when the primary control center functionality and the backup functionality are both available for use,</del> have backup functionality (provided either through a backup control center facility or contracted services) that includes monitoring, control, logging, and alarming sufficient for maintaining compliance with all Reliability Standards <del>applicable that depend on</del> a Balancing Authority and Transmission Operator's <u>primary control center functionality</u> respectively.- To avoid requiring tertiary functionality, backup functionality is not required during:</p> <p><u>R5.1 Planned outages of the primary or backup functionality of two weeks or less</u></p> <p><u>R5.2 Unplanned outages of the primary or backup functionality</u></p> <p>R7. The SDT believes that this is a standalone requirement as Requirement R1 covers the plan and Requirement R7 the capabilities. However, Requirement R7 has been re-written to provide additional clarity as to what was the intent of the SDT.</p> <p><del>R7. Each Reliability Coordinator, Balancing Authority, and applicable-Transmission Operator shall have primary and backup capabilities that does not depend on the primary control center each other or any single data center for any functionality required to maintain compliance with Reliability Standards that depend on the primary control functionality.-</del></p>
Pepco Holdings, Inc. - Affiliates	Yes	The requirements should be modified to recognize that duplicate and separate EMS facilities running in parallel without dependence on each other fulfill the need for backup facilities.
<p><b>Response:</b> The SDT believes that the primary and backup capabilities should be independent. The SDT believes that Requirement R7 is a standalone</p>		

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Organization	Question 7:	Question 7 Comments:
<p>requirement as Requirement R1 covers the plan and Requirement R7 the capabilities. However, Requirement R7 has been re-written to provide additional clarity as to what was the intent of the SDT.</p> <p>R7. Each Reliability Coordinator, Balancing Authority, and <del>applicable</del> Transmission Operator shall have <u>primary and backup capabilities</u> that <del>do</del> not depend on <del>the primary control center</del> each other or any single data center for any functionality required to maintain compliance with Reliability Standards <u>that depend on the primary control functionality</u>.</p>		
ReliabilityFirst Corporation	Yes	<p>In R1.3, I am not sure what "Operating Process" means. I am thinking may be you can say "Back-up Control Facility Operating guide". Also suggest replacing "backup functionality" with "backup control functionality". I feel this conveys the intent better.</p>
<p><b>Response:</b> The term "Operating Process" is a defined term.</p>		
PJM Interconnection	No	<p>PJM's concerns center on the basic premise of the standard; that there is one "primary" facility, and one "backup" facility. With the completion of our Business Continuity plan, PJM will be operated simultaneously from our existing control center, and another fully staffed, redundant center at a remote location (neither facility will be designated "primary" or "backup"). In the event of the loss of one of these facilities, this type of operation will accommodate an instantaneous transfer of all control to the redundant center. For this reason, PJM would like to propose the following addition to the applicability section of the standard 4.2. EOP-008-1 shall not apply to Reliability Coordinators, Transmission Owners, or Balancing Authorities that operate two equal, real-time facilities, at geographically diverse sites, either of which is capable of operating as a stand alone, fully functional data center and control center. PJM feels that this type of redundant operation goes far beyond the requirements in the current standard, to ensure continued reliable operations of the Bulk Electric System (BES) in the event that a control center becomes inoperable. The very narrow exemption provided in the proposed addition is the cleanest. Simplest way to accommodate this scenario</p> <p>If the SDT does not agree to the proposed addition to the applicability section, PJM's representative will deliver a redline version of the current draft of the standard to the group at their next meeting. This will have a requirement by requirement, measure by measure, list of all the changes that allow for this type of redundant operation to meet all compliance scrutiny. A copy of this document has been forwarded to Ed Dobrowolski of the NERC office. Beyond this PJM submits the following for consideration: In Applicability 4.1.2, the SDT creates a new class of TOP. This is beyond the Scope of the Standard. 4.1.2 can only apply to current registered entities.</p> <p>PJM would like to strike "allow visualization capabilities that" in R1.2.1. Tools for visualization are not in the requirements for any primary control center. Seems inappropriate to be in the requirements for a backup.</p> <p>Suggest changing R1.2.5 to read "All applicable NERC CIP Standards Suggest adding "unless this change is functionally</p>

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Organization	Question 7:	Question 7 Comments:
		<p>transparent to the users" to the end of R1.6.1. PJM is aware of several Local Control Centers that have telephone &amp; data switching that is done by a central station. No contact information changes, and the caller should be indifferent to the physical location of the receiver.</p> <p>R3 would require TOPs directing BES operations through other entities to be accountable for the compliance of all of these entities. If this is the intent of the SDT, the Applicability section of the standard needs to be modified to include Transmission Owners (TOs) in lieu of defining other applicable entities in R3.</p> <p>In R5, Monitoring, control, logging, and alarming should all be sub-bullets of R5 (as done in R1.6 "Process shall include"</p>
<p><b>Response:</b> The SDT believes that EOP-008 is applicable to all registered Reliability Coordinators, Transmission Operators, and Balancing Authorities.</p> <p>Redlined document: The SDT has reviewed the redlined document. There were no changes other than those suggested for the applicability change mentioned in the first paragraph of the comment. Since that change was not made, none of the redlined comments apply.</p> <p>R1.2.1: All facilities needed to display required operational information are considered visualization capabilities. The SDT considers this an important element for reliability and believes it needs to remain in the requirements.</p> <p>R1.2.5: The SDT has reviewed your suggestion and believes that the current wording is appropriate.</p> <p>R1.6.1: The SDT does not understand the comment as applied to Requirement R1.6.1 so no change has been made.</p> <p>R3: R3 has been re-written to provide clarity surrounding the SDT's intent.</p> <p><b>R3:</b> Each Reliability Coordinator, Balancing Authority, and <del>applicable</del> Transmission Operator directing BES operations through other entities shall <u>ensure that backup functionality exists for the BES operations performed through those other entities.</u> <del>include provisions for the loss of such entity's control functionality in its Operating Plan for backup functionality.</del></p> <p>R5: The SDT reviewed this suggestion and didn't feel that it substantially changed the requirement so no change has been made.</p>		
Ameren	Yes	<p>Requirement 2 is not needed. What is important is that the plan gets implemented when needed not that some compliance auditor can verify there is a copy of the plan at the backup and primary control centers. Most entities are going to have their plans at the primary and backup control centers to allow them to implement the plan. If they don't, they likely won't be able to implement their plan in the required time frame. Thus, they will already be violating another requirement so let's not provide an opportunity for double jeopardy.</p> <p>Requirement 4 should strike "that provides functionality required for maintaining compliance with all Reliability Standards applicable to the Reliability Coordinator". The RC is already required to comply with these standards regardless of whether they operate from the backup center or the primary center.</p>

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Organization	Question 7:	Question 7 Comments:
		<p>Requirement 5 should strike "sufficient for maintaining compliance with all Reliability Standards applicable to a Balancing Authority or Transmission Operator respectively". The BA and TOP are already required to comply with these standards regardless of whether they operate from the location of their backup capability or the primary center. Further, we urge the drafting team to consider combining requirements 4 and 5 to require full backup control centers for the TOP and BA as well as the RC.</p> <p>Requirement 5 is already stringent enough that a backup control center is likely required anyway. Combining the requirements just simplifies the standards.</p> <p>Requirement 6 is really a sub-requirement of requirement 1. Sub-requirement 6.1 is confusing. Because it is a sub-requirement, it must apply to requirement 6. Thus, it would seem that the sub-requirement is requiring the annual review and approval to occur within 60 days of any changes. What if there are multiple changes in the year? From this perspective, it appears that the sub-requirement is intended to reflect that changes can occur at any time. To clarify the requirement, we suggest the following language as a sub-requirement of R1 along with striking requirement 6 and 6.1: "Each RC, BA and TOP shall review and approve its Operating Plan for backup functionality annually and within sixty calendar days of any changes to the backup location, capabilities or contact information, modify the Operating Plan to reflect the changes."</p> <p>Requirement 7 is unnecessary as an explicit requirement. Each RC, TOP and BA is required to comply with all applicable requirements even if they are operating from the location of their backup functionality or backup control center. If their backup functionality relies on the primary control center, the RC, TOP and BA will be unable to comply with numerous other requirements in the event that they lose the functionality of their primary control center. Requirement 8 is not needed and does not accomplish the goal of ensuring the backup capability is available when needed. In reality, an RC, TOP and BA will have to operate utilizing backup functionality significantly more often than annually to ensure that backup functionality is available when needed. In fact, most RC, TOP, and BA already test their backup capability more often than annually even though the current requirement is for an annual test. They do this not because of the testing requirement but because of the need to continue to comply with other applicable requirements. If the other standards requirements already drive the entities to exceed this requirement, why is it needed? It is not.</p> <p>Requirement 9 should be struck. This requirement essentially represents an N-2 condition. The requirements should not try to anticipate extreme conditions such as this. Because RC, TOP and BA are still required to comply with the requirements even if they lose one of the operating centers or backup capability, the RC, TOP and BA will have to make plans to operate in the event of the failure of their last operable control center. Thus, failure to begin developing a plan to replace the backup capability or primary control center will surely result in a violation of another requirement (actually likely many requirements).</p>
<p><b>Response:</b> R2 is intended to provide clarity and remove ambiguity as it pertains to the implementation of backup control functionality. R2 will also ensure that the plan will be readily available to assist personnel during an actual event. The SDT believes that the requirement should remain.</p>		

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		<p>R4 &amp; 5: The intent of the drafting team was to provide for the operation of either the primary or backup system individually during periods of emergency, transition, or maintenance without the need for a tertiary backup capability. The SDT has modified Requirements R4 &amp; R5 to provide clarity on this matter.</p> <p><del>R4. Each Reliability Coordinator shall, during the time period when the primary control center functionality and the backup functionality are both available for use,</del> have a backup control center facility (provided through its own dedicated backup facility or at another entity's control center <u>with certified Reliability Coordinator operators</u>) that provides the functionality required for maintaining compliance with all Reliability Standards <del>applicable to the Reliability Coordinator that depend on primary control center functionality.</del> To avoid requiring a tertiary facility, a backup facility is not required during:</p> <p><u>R4.1 Planned outages of the primary or backup facilities of two weeks or less</u></p> <p><u>R4.2 Unplanned outages of the primary or backup facilities</u></p> <p><del>R5. Each Balancing Authority and applicable Transmission Operator shall, during the time period when the primary control center functionality and the backup functionality are both available for use,</del> have backup functionality (provided either through a backup control center facility or contracted services) that includes monitoring, control, logging, and alarming sufficient for maintaining compliance with all Reliability Standards <del>applicable that depend on</del> <u>to a Balancing Authority and Transmission Operator's primary control center functionality respectively.</u> To avoid requiring tertiary functionality, backup functionality is not required during:</p> <p><u>R5.1 Planned outages of the primary or backup functionality of two weeks or less</u></p> <p><u>R5.2 Unplanned outages of the primary or backup functionality</u></p> <p>R6: Requirement R1 addresses the content of the plan, while Requirement R6 addresses the timeliness of reviews and updates. Therefore, no change was made.</p> <p>R7/R8: Requirements R7 and R8 are intended to provide clarity and remove ambiguity as they pertain to implementation of backup control functionality. .</p> <p><del>R7. Each Reliability Coordinator, Balancing Authority, and applicable Transmission Operator shall have primary and backup capabilities that does not depend on the primary control center each other or any single data center for any functionality required to maintain compliance with Reliability Standards that depend on the primary control functionality.</del></p> <p>R9: The SDT believes this requirement adds clarity in the event of a catastrophic failure of either its primary facility or backup capability.</p>
FirstEnergy Corp.	Yes	<p>Requirement R1.6.2 is not clear. The meaning of primary/backup is ambiguous. This requirement should be revised to state, "Actions to manage the risk to the BES during the transition from primary to backup functionality as well as during simultaneous outages of both the primary and backup functionality."</p> <p>Requirements R4 and R5 as written are very confusing. It appears the drafting team's expectation is for an entity to have either the primary or backup control center available and in use at all times. If that is the intent, the requirement should say that. Also, it appears the drafting team's expectation is compliance with all applicable Reliability Standards at all times. This</p>

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		<p>is a requirement of the mandatory and enforceable reliability standards.</p> <p>R4 and R5 should be deleted.</p> <p>Requirement R6 as written is confusing. Who is intended to approve the Operating Plan for the backup functionality? Is it the intent of the drafting team for each entity to approve its own plan? Should these plans be required to be approved by a senior executive of the company? Should these plans be approved by the RC?</p> <p>Requirement R9 should be revised to state, “Each Reliability Coordinator, Balancing Authority, and applicable Transmission Operator that has experienced a loss of either its primary or backup capability due to a catastrophic event and anticipates the loss of either its primary or backup capability will last for more than six calendar months, shall provide a plan to its Regional Entity within six calendar months of the date when the functionality is lost, showing how it will re-establish backup capability.” This requirement as currently proposed allows an entity 6 months to restore its backup functionality. Backup functionality should be restored as soon as repairs can be made in most cases. Only in a catastrophic event should an entity be allowed to be without backup for such a long period of time.</p> <p>Requirement 7 is unnecessary. If a RC, TOP and BA, can comply with all applicable requirements at all times from a backup control center that relies on facilities of their primary control center, then they have met the intent of the standards.</p>
<p><b>Response:</b> R1.6.2: The SDT rewrote Requirement R1.6.2 to provide clarity but believes that covering simultaneous outages is not required.</p> <p><b>R1.6.2.</b> Actions to manage the risk to the BES during the transition from primary to backup functionality as well as during outages of the primary <del>/or</del> backup functionality. .</p> <p>R4 &amp; 5: The intent of the drafting team was to provide for the operation of either the primary or backup system individually during periods of emergency, transition, or maintenance without the need for a tertiary backup capability. The SDT has modified Requirements R4 &amp; R5 to provide clarity on this matter.</p> <p><b>R4.</b> Each Reliability Coordinator shall, <del>during the time period when the primary control center functionality and the backup functionality are both available for use,</del> have a backup control center facility (provided through its own dedicated backup facility or at another entity’s control center <u>with certified Reliability Coordinator operators</u>) that provides the functionality required for maintaining compliance with all Reliability Standards <del>applicable to the Reliability Coordinator that depend on primary control center functionality.</del> To avoid requiring a tertiary facility, a backup facility is not required during-;</p> <p><b>R4.1</b> <u>Planned outages of the primary or backup facilities of two weeks or less</u></p> <p><b>R4.2</b> <u>Unplanned outages of the primary or backup facilities</u></p> <p><b>R5.</b> Each Balancing Authority and <del>applicable</del> Transmission Operator shall, <del>during the time period when the primary control center functionality and the backup functionality are both available for use,</del> have backup functionality (provided either through a backup control center facility or contracted services) that includes monitoring, control, logging, and alarming sufficient for maintaining compliance with all Reliability Standards <del>applicable that depend on</del> <del>to</del> a Balancing Authority</p>		

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		<p>and Transmission Operator's <u>primary control center functionality</u> respectively. <del>To avoid requiring tertiary functionality, backup functionality is not required during:</del></p> <p><u>R5.1 Planned outages of the primary or backup functionality of two weeks or less</u></p> <p><u>R5.2 Unplanned outages of the primary or backup functionality</u></p> <p>R6: Each entity would determine who from their utility would be the appropriate signature. The SDT cannot determine who that might be for every registered entity. It is not the intent of the SDT that each entity's plan be approved by their respective RC.</p> <p>R7. The SDT believes that this is a standalone requirement as Requirement R1 covers the plan and Requirement R7 the capabilities. However, Requirement R7 has been re-written to provide additional clarity as to what was the intent of the SDT.</p> <p><u>R7. Each Reliability Coordinator, Balancing Authority, and <del>applicable</del>-Transmission Operator shall have <u>primary and backup capabilities</u> that <del>does</del> not depend on <del>the primary control center</del> each other or any single data center for any functionality required to maintain compliance with Reliability Standards that depend on the primary control functionality.</u></p> <p>R9: The SDT believes that primary or backup functionality should be restored when reasonably practicable after an event. The intent of this requirement is to have a plan within 6 months for major outage situations.</p>
Bureau of Reclamation	Yes	<p>In requirement R1.1 the term "for a prolonged period of time" has been added. As this is a nebulous addition that does not add clarification to the requirement it should be deleted.</p> <p>Requirement R3 requires the TOP when "...directing BES operations through other entities..." to "include provisions for the loss of such other entity's control functionality in its Operating Plan for backup functionality." We agree with this requirement, however, there is no requirement for such provision to ever be coordinated with the other entity, or for the other entity to even be informed. We suggest adding to R3 or R6, language similar to: "Those provisions in the Operating Plans for backup functionality that deal with the loss of another entity's control functionality shall be coordinated with that entity when the Operating Plans are reviewed annually."</p>
		<p><b>Response:</b> "Prolonged" is the term used by FERC in Order 693 and was defined there as "generally defined by the time it takes to restore the primary control center"</p> <p>Requirement R3 has been re-written to provide clarity surrounding the SDT's intent which should alleviate your concern.</p> <p><u>R3. Each Reliability Coordinator, Balancing Authority, and <del>applicable</del>-Transmission Operator directing BES operations through other entities shall <u>ensure that backup functionality exists for the BES operations performed through those other entities.</u> <del>include provisions for the loss of such entity's control functionality in its Operating Plan for backup functionality.</del></u></p>

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ISO/RTO Council	Yes	<p>We do not agree with the transition requirement of two hours. We believe that the transition time as worded in the existing standard actually requires full implementation of the backup plan in one hour or to provide an alternative to continue operations. Thus, we assume the drafting team must have had a compelling reason for changing to two hours. What is the reason? Is there data justifying it? We recommend changing it back to one hour.</p> <p>Requirement 2 is not needed. What is important is that the plan gets implemented when needed not that some compliance auditor can verify there is a copy of the plan at the backup and primary control centers. Most entities are going to have their plans at the primary and backup control centers to allow them to implement the plan. If they don't, they likely won't be able to implement their plan in the required time frame. Thus, they will already be violating another requirement so lets not provide an opportunity for double jeopardy. Requirement 3 stipulates that "Each applicable Transmission Operator directing BES operations through other entities shall include provisions for the loss of such entity's control functionality in its Operating Plan for backup functionality." We do not agree that this requirement should apply to the TOP only. There might well be situations that an RC or a BA directs it operations through other entities as well. We suggest the requirement should also include the RC and the BA by rewording the requirement to: "Each Reliability Coordinator, Balancing Authority and applicable Transmission Operator directing BES operations?"</p> <p>Wording of requirement 3 is ambiguous in that in some areas/jurisdictions, there are multiple TOPs that one of them directs the operations of the others. For example, an ISO is registered as a TOP while a transmission entity (an owner, for example) within the ISO footprint is also registered as a TOP. The two TOPs perform distinctly different tasks and may even have their tasks and responsibilities clearly stipulated in an agreement, market rule or regional reliability plan. The ISO-TOP directs operations of the transmission-entity-TOP while the latter may be solely responsible for switching operations and maintenance. Both need to have backup capability. The way R3 is worded can be interpreted that the ISO-TOP needs to be responsible for the backup capability of the transmission-entity-TOP. We do not believe this is the intent of R3, and this is not practical. To clarify this situation, we suggest R3 to be reworded to: "Each applicable Transmission Operator delegating its tasks for BES operations to other entities shall include provisions for the loss of such entity's control functionality in its Operating Plan for backup functionality." In other words, this requirement only applies to a TOP if it delegates it task (for which it is still fully responsible) to another entity.</p> <p>For Requirement 4, we are not sure why the condition: "?during the time period when the primary control center functionality and the backup functionality are both available for use?" is included since having both control center functionality available for use suffice to meet the condition for: "?have a backup control center facility (provided through its own dedicated backup facility or at another entity's control center) that provides the functionality required for maintaining compliance with all Reliability Standards applicable to the Reliability Coordinator." If the intent of this requirement is to ensure the functionality works, then the requirements should simply stipulate such a demonstration. In fact, the intent of R8 is to ensure that the backup capability is functional when called upon. We therefore hold the view that R4 (and R5) is not needed. We further do not understand the clause "that provides functionality required for maintaining compliance with all Reliability Standards</p>

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		<p>applicable to the Reliability Coordinator". The RC is already required to comply with these standards regardless of whether they operate from the backup center or the primary center. Requirements should never require compliance with other requirements because it creates the opportunity for double jeopardy.</p> <p>For Requirement 5, please see our comments on regarding Requirement 4.</p> <p>We do not think Requirement 5 is needed. If retained, the wording should be changed to require a demonstration of the backup capability's functionality. Furthermore, we don't understand the need for the statement "sufficient for maintaining compliance with all Reliability Standards applicable to a Balancing Authority or Transmission Operator respectively" in the requirement. The BA and TOP are already required to comply with these standards regardless of whether they operate from the location of their backup capability or the primary center.</p> <p>Requirement 6 is really a sub-requirement of requirement 1. Sub-requirement 6.1 is confusing. Because it is a sub-requirement, it must apply to requirement 6. Thus, it would seem that the sub-requirement is requiring the annual review and approval to occur within 60 days of any changes. What if there are multiple changes in the year? From this perspective, it appears that the sub-requirement is intended to reflect that changes can occur at any time. To clarify the requirement, we suggest the following language as a sub-requirement of R1 along with striking requirement 6 and 6.1: "Each RC, BA and TOP shall review and approve its Operating Plan for backup functionality annually and within sixty calendar days of any changes to the backup location, capabilities or contact information, modify the Operating Plan to reflect the changes."</p> <p>Requirement 7 is unnecessary as an explicit requirement. Each RC, TOP and BA is required to comply with all applicable requirements even if they are operating from the location of their backup functionality or backup control center. If their backup functionality relies on the primary control center, the RC, TOP and BA will be unable to comply with numerous other requirements in the event that they lose the functionality of their primary control center.</p> <p>Requirement 8 is not needed and does not accomplish the goal of ensuring the backup capability is available when needed. In reality, an RC, TOP and BA will have to confirm that availability of their backup functionality significantly more often than annually to ensure that backup functionality is available when needed. In fact, most RC, TOP, and BA already confirm the availability of their backup capability more often than annually even though the current requirement is for an annual test. They do this not because of the testing requirement but because of the need to continue to comply with other applicable requirements. If the other standards requirements already drive the entities to exceed this requirement, why is it needed? It is not.</p> <p>Requirement 9 should be struck. This requirement essentially represents an N-2 condition. The requirements should not try to anticipate extreme conditions such as this. Because RC, TOP and BA are still required to comply with the requirements even if they lose one of the operating centers or backup capability, the RC, TOP and BA will have to make plans to operate in the event of the failure of their last operable control center. Thus, failure to begin developing a plan to replace the backup</p>

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		capability or primary control center will surely result in a violation of another requirement (actually likely many requirements).
<p><b>Response:</b> The SDT believes two hours was broad enough to capture the very different business/risk decisions that have been made in the past regarding backup control centers (weighing the value of greater geographic separation over the need for rapid response), but also tight enough for entities to develop mitigations to address the maximum two hour transition period. The SDT believes that the new standard has significantly moved beyond the old standard (original Version 0, R1.8) by requiring immediate management of the risks</p> <p>R2: Requirement R2 is intended to provide clarity and remove ambiguity as it pertains to the implementation of backup control functionality. R2 will also ensure that the plan will be readily available to assist personnel during an actual event. The SDT believes that the requirement should remain.</p> <p>Requirement R3 has been re-written to provide clarity surrounding the SDT's intent.</p> <p><b>R3.</b> Each <u>Reliability Coordinator, Balancing Authority, and applicable</u> Transmission Operator directing BES operations through other entities shall <u>ensure that backup functionality exists for the BES operations performed through those other entities.</u> <del>include provisions for the loss of such entity's control functionality in its Operating Plan for backup functionality.</del></p> <p>R4 &amp; 5: The intent of the drafting team was to provide for the operation of either the primary or backup system individually during periods of emergency, transition, or maintenance without the need for a tertiary backup capability. The SDT has modified Requirements R4 &amp; R5 to provide clarity on this matter.</p> <p><b>R4.</b> Each Reliability Coordinator shall, <del>during the time period when the primary control center functionality and the backup functionality are both available for use,</del> have a backup control center facility (provided through its own dedicated backup facility or at another entity's control center <u>with certified Reliability Coordinator operators</u>) that provides the functionality required for maintaining compliance with all Reliability Standards <del>applicable to the Reliability Coordinator that depend on primary control center functionality.</del> <u>To avoid requiring a tertiary facility, a backup facility is not required during:</u></p> <p><b>R4.1</b> <u>Planned outages of the primary or backup facilities of two weeks or less</u></p> <p><b>R4.2</b> <u>Unplanned outages of the primary or backup facilities</u></p> <p><b>R5.</b> Each Balancing Authority and <del>applicable</del> Transmission Operator shall, <del>during the time period when the primary control center functionality and the backup functionality are both available for use,</del> have backup functionality (provided either through a backup control center facility or contracted services) that includes monitoring, control, logging, and alarming sufficient for maintaining compliance with all Reliability Standards <del>applicable that depend on</del> <u>to a Balancing Authority and Transmission Operator's primary control center functionality respectively.</u> <u>To avoid requiring tertiary functionality, backup functionality is not required during:</u></p> <p><b>R5.1</b> <u>Planned outages of the primary or backup functionality of two weeks or less</u></p> <p><b>R5.2</b> <u>Unplanned outages of the primary or backup functionality</u></p> <p>R6: Requirement R1 addresses the content of the plan, while Requirement 6 addresses the timeliness of reviews and updates. Therefore, no change was</p>		

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		<p>made. R6.1 was changed to provide clarity.</p> <p><b>R6.1</b> <del>The</del>An update and approval of the Operating Plan for backup functionality shall take place within sixty calendar days of any changes <del>to the backup location, in capabilities described in Requirement R1, or contact information.</del></p> <p>R7/R8: Requirements R7 and R8 are intended to provide clarity and remove ambiguity as they pertain to implementation of backup control functionality. The SDT believes that the requirements should remain but has revised Requirement R7 in an attempt to provide clarity.</p> <p><b>R7.</b> Each Reliability Coordinator, Balancing Authority, and <del>applicable</del> Transmission Operator shall have <u>primary and backup capability</u> <del>ies</del> that <del>does</del> not depend on <del>the primary control center</del> each other or any single data center for any functionality required to maintain compliance with Reliability Standards <u>that depend on the primary control functionality</u>.</p> <p>R9: The SDT believes that primary or backup functionality should be restored when reasonably practicable after an event. The intent of this requirement is to have a plan within 6 months for major outage situations.</p>
Northeast Utilities	Yes	<p>The revised language in R4 and R5 does not clarify the intent, which we believe is to prevent a violation for not having a backup facility during the time period when it has become necessary to utilize the backup facility. i.e. - that a backup for the backup is not required. We believe this clarification is not needed as separate requirements and results in confusing text. One possible solution would be to eliminate R4 &amp; R5 and include the clarifying thoughts in the Measures.</p> <p>R7 includes the necessary language from R4 &amp; R5, and could be included as one of the sub-requirements in R1, or combined with R1.3.</p>
		<p><b>Response:</b> R4 &amp; 5: The intent of the drafting team was to provide for the operation of either the primary or backup system individually during periods of emergency, transition, or maintenance without the need for a tertiary backup capability. The SDT has modified R4 &amp; R5 to provide clarity on this matter.</p> <p><b>R4.</b> Each Reliability Coordinator shall, <del>during the time period when the primary control center functionality and the backup functionality are both available for use,</del> have a backup control center facility (provided through its own dedicated backup facility or at another entity's control center <u>with certified Reliability Coordinator operators</u>) that provides the functionality required for maintaining compliance with all Reliability Standards <del>applicable to the Reliability Coordinator that depend on primary control center functionality.</del> To avoid requiring a tertiary facility, a backup facility is not required during;</p> <p><b>R4.1</b> <u>Planned outages of the primary or backup facilities of two weeks or less</u></p> <p><b>R4.2</b> <u>Unplanned outages of the primary or backup facilities</u></p> <p><b>R5.</b> Each Balancing Authority and <del>applicable</del> Transmission Operator shall, <del>during the time period when the primary control center functionality and the backup functionality are both available for use,</del> have backup functionality (provided either through a backup control center facility or contracted services) that includes monitoring, control, logging, and alarming sufficient for maintaining compliance with all Reliability Standards <del>applicable that depend on</del> <u>to</u> a Balancing Authority and Transmission Operator's <u>primary control center functionality respectively</u>. To avoid requiring tertiary functionality, <u>backup functionality is not required</u></p>

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		<p>during:</p> <p><a href="#">R5.1 Planned outages of the primary or backup functionality of two weeks or less</a></p> <p><a href="#">R5.2 Unplanned outages of the primary or backup functionality</a></p> <p>R7: Requirement R7 is intended to provide clarity and remove ambiguity as it pertains to implementation of backup control functionality. The SDT believes that the requirement should remain but has revised Requirement R7 in an attempt to provide additional clarity.</p> <p><a href="#">R7. Each Reliability Coordinator, Balancing Authority, and applicable Transmission Operator shall have primary and backup capabilities that does not depend on the primary control center each other or any single data center for any functionality required to maintain compliance with Reliability Standards that depend on the primary control functionality.</a></p>
Midwest ISO	No	<p>Requirement 2 is not needed. What is important is that the plan gets implemented when needed not that some compliance auditor can verify there is a copy of the plan at the backup and primary control centers. Most entities are going to have their plans at the primary and backup control centers to allow them to implement the plan. If they don't, they likely won't be able to implement their plan in the required time frame. Thus, they will already be violating another requirement so lets not provide an opportunity for double jeopardy.</p> <p>Requirement 4 should strike "that provides functionality required for maintaining compliance with all Reliability Standards applicable to the Reliability Coordinator". The RC is already required to comply with these standards regardless of whether they operate from the backup center or the primary center.</p> <p>Requirement 5 should strike "sufficient for maintaining compliance with all Reliability Standards applicable to a Balancing Authority or Transmission Operator respectively". The BA and TOP are already required to comply with these standards regardless of whether they operate from the location of their backup capability or the primary center. Further, we urge the drafting team to consider combining requirements 4 and 5 to require full backup control centers for the TOP and BA as well as the RC. Requirement 5 is already stringent enough that a backup control center is likely required anyway. Combining the requirements just simplifies the standards.</p> <p>Requirement 6 is really a sub-requirement of requirement 1. Sub-requirement 6.1 is confusing. Because it is a sub-requirement, it must apply to requirement 6. Thus, it would seem that the sub-requirement is requiring the annual review and approval to occur within 60 days of any changes. What if there are multiple changes in the year? From this perspective, it appears that the sub-requirement is intended to reflect that changes can occur at any time. To clarify the requirement, we suggest the following language as a sub-requirement of R1 along with striking requirement 6 and 6.1: "Each RC, BA an TOP shall review and approve its Operating Plan for backup functionality annually and within sixty calendar days of any changes to the backup location, capabilities or contact information, modify the Operating Plan to reflect the changes."</p> <p>Requirement 7 is unnecessary as an explicit requirement. Each RC, TOP and BA is required to comply with all applicable</p>

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		<p>requirements even if they are operating from the location of their backup functionality or backup control center. If their backup functionality relies on the primary control center, the RC, TOP and BA will be unable to comply with numerous other requirements in the event that they lose the functionality of their primary control center.</p> <p>Requirement 8 is not needed and does not accomplish the goal of ensuring the backup capability is available when needed. In reality, an RC, TOP and BA will have to operate utilizing backup functionality significantly more often than annually to ensure that backup functionality is available when needed. In fact, most RC, TOP, and BA already test their backup capability more often than annually even though the current requirement is for an annual test. They do this not because of the testing requirement but because of the need to continue to comply with other applicable requirements. If the other standards requirements already drive the entities to exceed this requirement, why is it needed? It is not.</p> <p>Requirement 9 should be struck. This requirement essentially represents an N-2 condition. The requirements should not try to anticipate extreme conditions such as this. Because RC, TOP and BA are still required to comply with the requirements even if they lose one of the operating centers or backup capability, the RC, TOP and BA will have to make plans to operate in the event of the failure of their last operable control center. Thus, failure to begin developing a plan to replace the backup capability or primary control center will surely result in a violation of another requirement (actually likely many requirements).</p>
<p><b>Response:</b> Requirement R2 is intended to provide clarity and remove ambiguity as it pertains to the implementation of backup control functionality. R2 will also ensure that the plan will be readily available to assist personnel during an actual event. The SDT believes that the requirement should remain.</p> <p>R4 &amp; 5: The intent of the drafting team was to provide for the operation of either the primary or backup system individually during periods of emergency, transition, or maintenance without the need for a tertiary backup capability. The SDT has modified Requirements R4 &amp; R5 to provide clarity on this matter.</p> <p><b>R4.</b> Each Reliability Coordinator shall, <del>during the time period when the primary control center functionality and the backup functionality are both available for use,</del> have a backup control center facility (provided through its own dedicated backup facility or at another entity's control center <u>with certified Reliability Coordinator operators</u>) that provides the functionality required for maintaining compliance with all Reliability Standards <del>applicable to the Reliability Coordinator that depend on primary control center functionality.</del> To avoid requiring a tertiary facility, a backup facility is not required during:</p> <p><b>R4.1</b> <u>Planned outages of the primary or backup facilities of two weeks or less</u></p> <p><b>R4.2</b> <u>Unplanned outages of the primary or backup facilities</u></p> <p><b>R5.</b> Each Balancing Authority and <del>applicable</del> Transmission Operator shall, <del>during the time period when the primary control center functionality and the backup functionality are both available for use,</del> have backup functionality (provided either through a backup control center facility or contracted services) that includes monitoring, control, logging, and alarming sufficient for maintaining compliance with all Reliability Standards <del>applicable that depend on</del> <u>to a Balancing Authority and Transmission Operator's primary control center functionality respectively.</u> To avoid requiring tertiary functionality, backup functionality is not required during:</p>		

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Organization	Question 7:	Question 7 Comments:
		<p><a href="#">R5.1 Planned outages of the primary or backup functionality of two weeks or less</a></p> <p><a href="#">R5.2 Unplanned outages of the primary or backup functionality</a></p> <p>R6: Requirement 1 addresses the content of the plan, while Requirement 6 addresses the timeliness of reviews and updates. Therefore, no change was made.</p> <p>R7/R8: Requirements R7 and R8 are intended to provide clarity and remove ambiguity as they pertain to implementation of backup control functionality. The SDT believes that the requirements should remain but has revised Requirement R7 in an attempt to provide additional clarity.</p> <p><a href="#">R7. Each Reliability Coordinator, Balancing Authority, and applicable-Transmission Operator shall have primary and backup capabilities that does not depend on the primary control center each other or any single data center for any functionality required to maintain compliance with Reliability Standards that depend on the primary control functionality.</a></p> <p>R9: The SDT believes that primary or backup functionality should be restored when reasonably practicable after an event. The intent of this requirement is to have a plan within 6 months for major outage situations.</p>
Northeast Utilities	Yes	
Midwest ISO	Yes	
WECC Reliability Coordinator Comment Working Group	No	
Manitoba Hydro	No	
Oncor Electric Delivery	No	
Santee Cooper	No	

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Organization	Question 7:	Question 7 Comments:
Bonneville Power Administration	No	
Dynergy	No	
AEP	No	
<a href="#">Response: Thank you for your response.</a>		

8. Do you believe this standard will help deliver an adequate level of reliability?

**Summary Consideration:**

Most comments were positive with respect to the standard delivering an adequate level of reliability.

The following requirements were changed due to industry comments in an attempt to provide additional clarity:

**R1.6** An Operating Process describing the actions to be taken during the transition period between the loss of primary control center functionality and the time ~~to fully implement the backup functionality elements identified in Requirement R1.2~~~~get backup functionality up and running~~. The Operating Process shall also include:

**R3.** Each Reliability Coordinator, Balancing Authority, and applicable-Transmission Operator directing BES operations through other entities shall ensure that backup functionality exists for the BES operations performed through those other entities. ~~include provisions for the loss of such entity's control functionality in its Operating Plan for backup functionality~~

**R4.** Each Reliability Coordinator shall, ~~during the time period when the primary control center functionality and the backup functionality are both available for use,~~ have a backup control center facility (provided through its own dedicated backup facility or at another entity's control center with certified Reliability Coordinator operators) that provides the functionality required for maintaining compliance with all Reliability Standards ~~applicable to the Reliability Coordinator~~ that depend on primary control center functionality. To avoid requiring a tertiary facility, a backup facility is not required during:

**R5.** Each Balancing Authority and ~~applicable~~-Transmission Operator shall, ~~during the time period when the primary control center functionality and the backup functionality are both available for use,~~ have backup functionality (provided either through a backup control center facility or contracted services) that includes monitoring, control, logging, and alarming sufficient for maintaining compliance with all Reliability Standards ~~applicable~~ that depend on ~~to~~ a Balancing Authority and Transmission Operator's primary control center functionality respectively. To avoid requiring tertiary functionality, backup functionality is not required during:

**R4 VSL**

R4	The Reliability Coordinator has demonstrated that it has a backup control center facility (provided through its own dedicated backup facility or at another entity's control	The Reliability Coordinator has demonstrated that it has a backup control center facility (provided through its own dedicated backup facility or at another entity's control	The Reliability Coordinator has demonstrated that it has a backup control center facility (provided through its own dedicated backup facility or at another entity's control	The Reliability Coordinator has not demonstrated that it has a backup control center facility (provided through its own dedicated backup facility or at another entity's control
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	<p>center <u>with certified Reliability Coordinator operators</u>) in accordance with ¶Requirement R4 but it <del>only provides</del><u>does not provide</u> the functionality required for maintaining compliance with <del>90%</del><u>one or more</u> of the <u>Requirements in the Reliability Standards applicable to the Reliability Coordinator that depend on the primary control center functionality and which have a Lower VRF.</u> <del>or the evidence of the demonstration is not dated</del></p>	<p>center <u>with certified Reliability Coordinator operators</u>) in accordance with ¶Requirement R4 but it <del>only provides</del><u>does not provide</u> the functionality required for maintaining compliance with <del>80%</del><u>one or more</u> of the <u>Requirements in the Reliability Standards applicable to the Reliability Coordinator that depend on the primary control center functionality and which have a Medium VRF.</u></p>	<p>center <u>with certified Reliability Coordinator operators</u>) in accordance with ¶Requirement R4 but it <del>only provides</del><u>does not provide</u> the functionality required for maintaining compliance with <del>70%</del><u>one or more</u> of the <u>Requirements in the Reliability Standards applicable to the Reliability Coordinator that depend on the primary control center functionality and which have a High VRF.</u></p>	<p>center <u>with certified Reliability Coordinator operators</u>) in accordance with ¶Requirement R4.</p>
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R5 VSL

R5	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance</p>	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance</p>	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance</p>	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has not demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in</p>
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	with <del>Requirement</del> Requirement R5 but it <del>only includes</del> <u>does not include</u> monitoring, control, logging, and alarming sufficient for maintaining compliance with <del>90%</del> <u>one or more</u> of the <u>Requirements in the Reliability Standards</u> applicable to a Balancing Authority and Transmission Operator respectively <u>that depend on the primary control center functionality and which have a Lower VRF.</u> <del>or its evidence is not dated.</del>	with <del>Requirement</del> Requirement R5 but it <del>only includes</del> <u>does not include</u> monitoring, control, logging, and alarming sufficient for maintaining compliance with <del>80%</del> <u>one or more</u> of the <u>Requirements in the Reliability Standards</u> applicable to a Balancing Authority and Transmission Operator respectively <u>that depend on the primary control center functionality and which have a Medium VRF</u>	with <del>Requirement</del> Requirement R5 but it <del>only includes</del> <u>does not include</u> monitoring, control, logging, and alarming sufficient for maintaining compliance with <del>70%</del> <u>one or more</u> of the <u>Requirements in the Reliability Standards</u> applicable to a Balancing Authority and Transmission Operator respectively <u>that depend on the primary control center functionality and which have a High VRF.</u>	accordance with <del>Requirement</del> Requirement R5.
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Organization	Question 8:	Question 8 Comments:
Consumers Energy Company	No	When drafting standards we should keep in mind the primary goal. That goal is to provide a high level of reliability. There needs to be a balance between the actions of making our operations reliable or taking away from that effort by putting a program in place that majority of effort is administrative, thus detracting from the original goal. Back-up facilities are needed but the amount of data being requested here seems to be excessive burden that changes the focus from preparing for back-up operations to preparing for a NERC audit.
<p><b>Response:</b> While the BF SDT acknowledges that there are more Measures and Data Retention specified in the new standard EOP-008-1 as compared to the existing standard, we have attempted to craft a standard with the minimum administrative requirements needed to achieve the reliability goals. The Applicability section was written to include only those entities that could have an impact on the BES.”</p>		
Puget Sound	Yes	However, I am concerned that many of the additional requirements of this standard do not add to reliability, just increase

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Organization	Question 8:	Question 8 Comments:
Energy		documentation requirements, staffing and costs for a minimal increase in reliability. I am not aware of an instance where an entity has implemented their loss of control center plan and placed the BES in a perilous situation. There are actually few entities large enough to have this affect. I am fully on board with RCs having the capabilities prescribed in this standard, but there are many entities for which this is overkill. Perhaps the standard should place the burden on the RRO or RC to determine adequate levels of backup facilities for the BAs and TOPs under their jurisdiction.
<p><b>Response:</b> While the BF SDT acknowledges that there are more Measures and Data Retention specified in the new standard EOP-008 as compared to the existing standard we have attempted to craft a standard with a minimum administrative requirement needed to achieve the reliability goals. The Applicability section was written to include only those entities that could have an impact on the BES.</p> <p>After consideration, the SDT determined that providing more latitude for the RE or RC would result in a standard that was too subjective and inconsistent.</p>		
Sierra Pacific Power Co. (dba NV Energy)	Yes	Yes and No. This Standard has some very positive attributes that will help the industry attain an adequate level of reliability. These include the requirement to establish a Plan and Process for transition to the backup center, the definition of transition time from Primary to Backup center and the requirement to conduct an annual test of the functionality. These are necessary elements to ensure reasonable functionality of the backup plan to continue operations. Where it perhaps goes to far is in the areas of requiring auditable records of updates/approvals for minor and insignificant changes to the Plan, and the prescription of the level of redundancy being unclear and perhaps impossible to comply with depending on the assumptions made about the contingency that causes the backup plan to be executed.
<p><b>Response:</b> The SDT believes that having an up to date Plan is important and that the administrative burden is commensurate with the benefit.</p> <p>The SDT attempted to select language to provide the best balance between clarity and flexibility to match the diverse circumstances of all applicable entities.</p>		
CenterPoint Energy	No	<p>CenterPoint Energy believes this standard will likely deliver a more than adequate level of reliability. Some might argue that more than adequate reliability is always good. However, CenterPoint Energy disagrees with a one-sided view that ignores cost considerations. If more than adequate reliability can be delivered for minimal cost, then such a level of reliability is certainly in the public interest. However, if more than adequate reliability comes at a significant cost, then a balanced view that weighs costs and benefits would better serve the public interest.</p> <p>Specifically, CenterPoint Energy believes R1.3 is unnecessary and could have unintended consequences. R1.2 outlines the requisite backup functionality, rendering R1.3 unnecessary. Given the infrequency with which loss of primary control center functionality occurs (due to the redundancy and hardening of such facilities), it is unnecessary and probably not cost-effective for backup control center functionality to be consistent with the primary control center. Some reduced backup functionality, that still meets the requirements of R1.2, is probably the most cost-effective approach in most circumstances to ensure adequate reliability in the infrequent circumstance of the loss of primary control center functionality. Furthermore, R1.3 could</p>

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Organization	Question 8:	Question 8 Comments:
		<p>have the unintended consequence of entities choosing not to voluntarily exceed the minimum required functionality of the primary control center because R1.3 essentially doubles the cost of any discretionary upgrade to the primary control by mandating that the backup facility maintain the same discretionary functionality. Moreover, the primary control center may have functionality unrelated to reliability considerations, such as market-related functionality, that arguably would need to be provided by the backup control center under R1.3. Backup functionality unrelated to reliability considerations should not be mandated by reliability standards but instead should be left to individual entities and their market stakeholders to decide. For all these reasons, CenterPoint Energy believes R1.3 should be deleted.</p> <p>Furthermore, CenterPoint Energy recommends that the SDT consider modifying R4 and R5 to specify that backup functionality be sufficient to comply with all medium or higher VRF requirements. Again, given the infrequency of loss of primary control center events, the most cost-effective approach to ensure an adequate level of reliability for backup control center functionality is probably to not require the lower VRFs to be maintained in such rare circumstances. When considering this recommendation, it might be helpful to remember that control centers operated reliably for years before the version 0 and beyond NERC standards without all the functionality now available and now required by NERC standards. Generally, such reliability was accomplished through more conservative operation. More conservative operation has costs usually in terms of inefficient generation dispatch. However, an entity may find that rare instances of inefficient generation dispatch due to conservative operation by a backup facility might be less costly than the on-going costs to retain full backup capability to meet all the NERC requirements, even the lower VRF requirements.</p>
<p><b>Response:</b> The BFSDT agrees that there can be significant costs to entities to have a backup control center, however, the standard allows for entities to also contract backup services at another Control Center facility. There will always be challenges for entities to balance costs; however, the BFSDT is of the opinion that it is essential that backup facilities or contracted services be incorporated to ensure reliable operations of the BES. The SDT distinguishes between requiring a backup facility to be “consistent” and requiring it to be a “duplicate”.</p> <p>Requirement R1.3 was intended, for example, to require that the SCADA database at the backup system be routinely updated to match the one at the primary site, so that if you have to operate from the backup system you can still obtain the data you need to operate the system. It does not require that every system present at the primary site also be present at the backup site.</p> <p>Requirements R4 &amp; R5 and their VSLs have been clarified to address your concern.</p> <p><b>R4.</b> Each Reliability Coordinator shall, <del>during the time period when the primary control center functionality and the backup functionality are both available for use,</del> have a backup control center facility (provided through its own dedicated backup facility or at another entity’s control center <u>with certified Reliability Coordinator operators</u>) that provides the functionality required for maintaining compliance with all Reliability Standards <del>applicable to the Reliability Coordinator that depend on primary control center functionality.</del> <u>To avoid requiring a tertiary facility, a backup facility is not required during-;</u></p> <p><b>R5.</b> Each Balancing Authority and <del>applicable</del>-Transmission Operator shall, <del>during the time period when the primary control center functionality and the backup functionality are both available for use,</del> have backup functionality (provided either through a backup control center facility or contracted services) that includes</p>		

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Organization	Question 8:	Question 8 Comments:		
<p>monitoring, control, logging, and alarming sufficient for maintaining compliance with all Reliability Standards <del>applicable</del> <u>that depend on</u> <del>to</del> a Balancing Authority and Transmission Operator's primary control center functionality respectively. <del>To avoid requiring tertiary functionality, backup functionality is not required during:</del></p> <p>R4 VSL</p>				
<p>R4</p>	<p>The Reliability Coordinator has demonstrated that it has a backup control center facility (provided through its own dedicated backup facility or at another entity's control center <u>with certified Reliability Coordinator operators</u>) in accordance with <del>R</del>Requirement R4 but it <del>only provides</del> <u>does not provide</u> the functionality required for maintaining compliance with <del>90%</del> <u>one or more</u> of the <u>Requirements in the Reliability Standards applicable to the Reliability Coordinator that depend on the primary control center functionality and which have a Lower VRF.</u> <del>Of the evidence of the demonstration is not</del></p>	<p>The Reliability Coordinator has demonstrated that it has a backup control center facility (provided through its own dedicated backup facility or at another entity's control center <u>with certified Reliability Coordinator operators</u>) in accordance with <del>R</del>Requirement R4 but it <del>only provides</del> <u>does not provide</u> the functionality required for maintaining compliance with <del>80%</del> <u>one or more</u> of the <u>Requirements in the Reliability Standards applicable to the Reliability Coordinator that depend on the primary control center functionality and which have a Medium VRF.</u></p>	<p>The Reliability Coordinator has demonstrated that it has a backup control center facility (provided through its own dedicated backup facility or at another entity's control center <u>with certified Reliability Coordinator operators</u>) in accordance with <del>R</del>Requirement R4 but it <del>only provides</del> <u>does not provide</u> the functionality required for maintaining compliance with <del>70%</del> <u>one or more</u> of the <u>Requirements in the Reliability Standards applicable to the Reliability Coordinator that depend on the primary control center functionality and which have a High VRF.</u></p>	<p>The Reliability Coordinator has not demonstrated that it has a backup control center facility (provided through its own dedicated backup facility or at another entity's control center <u>with certified Reliability Coordinator operators</u>) in accordance with <del>R</del>Requirement R4.</p>

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Organization	Question 8:	Question 8 Comments:			
		<del>dated</del>			
<b>R5 VSL</b>					
<b>R5</b>	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with <del>Requirement R5</del> but it <del>only includes</del> <u>does not include</u> monitoring, control, logging, and alarming sufficient for maintaining compliance with <del>90%</del> <u>one or more</u> of the <u>Requirements in the Reliability Standards applicable to a Balancing Authority and Transmission Operator respectively that depend on the primary control center functionality and which have a Lower VRF.</u> <del>of its evidence is not</del></p>	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with <del>Requirement R5</del> but it <del>only includes</del> <u>does not include</u> monitoring, control, logging, and alarming sufficient for maintaining compliance with <del>80%</del> <u>one or more</u> of the <u>Requirements in the Reliability Standards applicable to a Balancing Authority and Transmission Operator respectively that depend on the primary control center functionality and which have a Medium VRF</u></p>	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with <del>Requirement R5</del> but it <del>only includes</del> <u>does not include</u> monitoring, control, logging, and alarming sufficient for maintaining compliance with <del>70%</del> <u>one or more</u> of the <u>Requirements in the Reliability Standards applicable to a Balancing Authority and Transmission Operator respectively that depend on the primary control center functionality and which have a High VRF.</u></p>	<p>The Balancing Authority or <del>applicable</del> Transmission Operator has not demonstrated that it has backup functionality (provided either through a backup control center facility or contracted services) in accordance with <del>Requirement R5</del>.</p>	

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Organization	Question 8:	Question 8 Comments:
		<del>dated.</del>
Western Area Power Administration	No	Without understanding the implications regarding some of the vague wording on this draft, constructive comments cannot be provided.
<p><b>Response:</b> Without specific comments, the SDT can not provide specific responses. Thank you for your response.</p>		
Brazos Electric Power Cooperative, Inc.	No	We believe this standard to be excessive if the intent is as stated above to have all TO's have a backup control center.
<p><b>Response:</b> The SDT was careful to refer to backup capability as opposed to backup control center or even backup facility. There is no requirement for a TO to have a backup control center in this standard.</p>		
PJM Interconnection	No	No, not as currently drafted. These comments are extensive, and address nearly every requirement and measure. A thorough re-write of the Standard will be necessary before this can go to ballot.
<p><b>Response:</b> The SDT has made numerous changes to the standard based on the specific comments received. Please see responses to specific comments in this and other questions.</p>		
AEP	Yes	The two hour requirement (between the loss of primary control center functionality and the time to fully implement the backup plan and get backup functionality up and running) is a more attainable goal. The transition period is addressed in R1.6. With the extended transition period, R1.6 could be expanded to address reliability concerns during the transition.
<p><b>Response:</b> Requirement R1.6 has been changed in an attempt to provide additional clarity.</p> <p><b>R1.6</b> An Operating Process describing the actions to be taken during the transition period between the loss of primary control center functionality and the time <del>to to</del> fully implement the backup functionality elements identified in Requirement R1.2 <del>get backup functionality up and running</del>. The Operating Process shall also include:</p>		
Bureau of	No	With regard to the decision not to include Generator Operator (GOP) centrally dispatched control centers we are concerned

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Organization	Question 8:	Question 8 Comments:
Reclamation		with the introduction of the degree of BES risk to the decision to make a standard applicable to a Reliability Function or to include it in a requirement. This is exemplified in the SDT's statement in their consideration: "The primary issue of whether centrally dispatched generation control centers should be applicable entities to the EOP-008-1 standard is an issue of risk exposure to the reliable operation of the BES." We believe that the usual emphasis is on risk avoidance, and such a change in the basis of what is included or covered by a standard or to whom it applies should be determined by using the NERC ANSI approved Standards process and not a single drafting team.
<p><b>Response:</b> The SDT sees risk exposure and risk avoidance as two sides of the same coin, i.e., two ways of looking at the same issue. The SDT did not intend, and does not believe, that it did depart from the accepted approach to this type of question. Additionally, the SDT has revised R3 in an attempt to alleviate such concerns.</p> <p><b>R3.</b> Each Reliability Coordinator, Balancing Authority, and applicable Transmission Operator directing BES operations through other entities shall ensure that backup functionality exists for the BES operations performed through those other entities. <del>include provisions for the loss of such entity's control functionality in its Operating Plan for backup functionality.</del></p> <p>The NERC ANSI approved process is that an SDT crafts the initial draft of a standard and then proposes it to the industry in a series of open postings for comments and eventual balloting.</p>		
ISO/RTO Council	No	We believe that the standard may actually reduce reliability slightly given that the timing requirement for operating utilizing your backup capability has been increased. Given that the need to utilize your backup capability is a rare event, even this reduced level of reliability may be acceptable.
<p><b>Response:</b> Although the amount of time has been increased what must be achieved within the time period has been even more significantly increased. The current EOP-008-0 only requires interim measures to be taken if backup capability will not be in place within an hour; there is theoretically no time limit to implement backup functionality. The SDT wanted to provide a realistic amount of time and place an absolute limit on establishing backup functionality.</p>		
FirstEnergy Corp.	Yes	Yes - the standard is much improved in defining expectations of implementing back-up capability, testing of the back-up center etc. Although the time allowed to implement backup capability could be perceived to be an increase over the existing EOP-008-1 standard, the existing standard does not include a hard and fast rule on a 1 hour implementation. In EOP-008-1, an entity was permitted to have "interim provisions" without a hard-stop on the time needed to implement the back-up center. In the proposed EOP-008-2 standard, we believe the SDT made the appropriate steps to put a firm time limit for implementation and we feel the 2 hour limit is sufficient. The need to utilize one's backup capability is a rare event and the adjustment made should not adversely effect reliability of the BES.
WECC	Yes	

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Organization	Question 8:	Question 8 Comments:
Reliability Coordinator Comment Working Group		
San Diego Gas and Electric	Yes	
ComEd / Exelon	Yes	
Entergy System Planning & Operations (Generation & Marketing)	Yes	
Manitoba Hydro	Yes	
San Diego Gas and Electric	Yes	
Progress Energy Carolinas, Inc.	Yes	
NPCC	Yes	Backup functionality for RCs, BAs and applicable TOPs are essential to ensuring continuous reliable operation of the BES. This standard is needed to provide this assurance.

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Organization	Question 8:	Question 8 Comments:
Southern Company Transmission	No	Not in its current form. However, with the changes we have recommended, we believe that it could.
Xcel Energy	Yes	There are some areas of concern that need addressed/ clarified. However, if they are properly addressed, then we feel this standard will help deliver an adequate level of reliability.
Duke Energy	Yes	It appears that this standard is moving in the right direction.
MRO NERC Standards Review Subcommittee	Yes	The MRO commends the SDT. The SDT has incorporated many past comments and given great replies to the many questions, Thank you.
ITC	Yes	
Oncor Electric Delivery	Yes	
ISO New England Inc	Yes	Backup functionality for RCs, BAs and applicable TOPs are essential to ensuring continuous reliable operation of the BES. This standard is needed to provide this assurance.
Independent Electricity System Operator	Yes	Backup functionality for RCs, BAs and applicable TOPs is essential to ensuring continuous and reliable operation of the BES. This standard is needed to provide this assurance.
Progress Energy-Florida	Yes	
Pepco Holdings, Inc.	Yes	Operative word is -help- see previous comments

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Organization	Question 8:	Question 8 Comments:
- Affiliates		
ReliabilityFirst Corporation	Yes	
Bonneville Power Administration	Yes	
Dynergy	Yes	
Hydro-Québec TransÉnergie (HQT)	Yes	
Santee Cooper	No	We believe with our comments from above included in the standard, that this standard will help deliver an adequate level of reliability.
Ameren	No	With suggested changes.
<p><b>Response:</b> Thank you for your response.</p>		