

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Please use this form to submit comments on the 1st draft of the standards for Backup Facilities (Project 2006-04). Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "BF Standards" in the subject line. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	William J. Smith	
Organization:	Allegheny Power	
Telephone:	724.838.6552	
E-mail:	wsmith1@alleghenypower.com	
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input checked="" type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background Information

The Backup Facilities Standard Drafting Team (SDT) is submitting these questions as part of its initial effort in revising EOP-008. Extensive revisions have been made to the existing standard. Many of these changes are a direct result of comments received from industry and from FERC Order 693.

The SDT is attempting to come up with practical limits as to which Transmission Operators (TOPs) need to be covered by this standard. This is to avoid placing undue burdens on small entities that would not have a deleterious effect on the reliability of the Interconnection. In that same vein, the SDT is allowing TOPs and BAs to provide needed backup functionality through third-party contract services. Again, this is an effort to reduce the burden on these entities without adversely impacting reliability.

The SDT has not included the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard. This position is in conflict with a directive in FERC Order 693. The SDT has discussed this issue at length and has been unable to come up with a reliability-based reason for centrally dispatched GOP inclusion. However, this position will need to be defended at FERC when this standard is filed. Along those lines, the SDT is working on a position paper outlining the reasons for this approach. A specific question has been included on this topic with a direct request for inputs from GOPs. In general, the SDT must provide an alternative approach that presents an equally effective and efficient solution to the one proposed in FERC Order 693. This could include items such as suggesting strengthening other standards, presenting business practices that may be followed now that would preclude the need for a backup control center, lesser cost alternatives, etc.

The SDT has also established timeframes for when backup capability must be available. These time frames are different for Reliability Coordinators (RCs) versus TOPs and BAs. Specific questions asking for feedback on these times have been included below. In addition, questions related to times involved for testing and re-establishment of primary/backup capability have been raised.

The Backup Facilities Standard Drafting Team would like to receive industry comments on this revised standard. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "BF Standards" by **March 7, 2008**.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

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

1. The SDT has attempted to limit the applicability provisions for Transmission Operators in this standard. Do you agree with this limitation? If not, please provide the reasons and alternatives.

Yes

No

Comments: All control centers (Generator Operator or Transmission Owner (LCC) that control facilities via an EMS, GMS, etc. should comply with a Backup Facility criteria. That criteria may be in the form of a NERC Standard or a set of RTO/ISO requirements. In the case where a set RTO/ISO requirements are used for control centers that are not Transmission Operators, those requirements should meet a minimum criteria established in a NERC Standard to guarantee uniformity on Bulk Electric System.

2. The SDT has decided not to include the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard at this time. The SDT believes that there are other equally efficient and effective methods for the GOPs to continue to fulfill their role in preserving the reliability of the Interconnection following the loss of its control center. This position is contrary to a directive in FERC Order 693. The SDT will need to provide specific reasoning to FERC for adopting such an approach and is therefore, soliciting opinions from the industry. Do you agree with this approach? If not, please state the reasons and suggest an alternative. The SDT is particularly interested in receiving inputs from GOPs as to how they currently handle such a situation.

Yes

No

Comments: See comment to question #1

3. Requirement R6 — Do you think that the 2-hour transition time frame for Reliability Coordinators is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: See comment to Question #4

4. Requirement R7, R8.1, and R8.2 — Do you think the 2 to 6-hour time frame for applicable Transmission Operators and Balancing Authorities is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: The difference in the transition time frame for the RC compared to the TOP and BA would seem to indicate that the loss of the functions of the RC are deemed to be more critical to the reliability of the BES than the the loss of the functions conducted by the TOP and BA. To the contrary, it is most likely that the RC functions are dependant

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

on the data supplied from a TOP or BA. The loss of the TOP or BA primary facility could deprive the RC of critical information. A 2-hour transition time seems appropriate for all three entities.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

5. Requirement R12 — Do you think that implementation or testing operations for a minimum of two hours annually is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: A 2 hour test would most likely not be long enough to test all the functions that occur in a routine day. A minimum time requirement makes less sense than requiring that all functions required to be conducted during a normal day be tested.

6. Requirement R13 — The SDT proposes that within 6 calendar months of having lost its primary control center or backup capability that an entity will have a plan in place for re-establishing backup capability. Is 6 calendar months appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: The RC, TOP, or BA that losses it's primary or back-up control center should notify it's Regional Entity and neighboring entities within 24 hours. Within that 24 hour period, that entity should provide a plan that would outline how the loss of the remaining facility would be handled. There should always be a plan for the next contingency. A plan to re-establish a lost facility is less important that providing a plan to handle the loss of the remaining facility.

7. If you are aware of any regional variances that would be required as a result of this standard, or if you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement, please identify them here.

Yes

No

Comments:

8. If you have any other comments on the proposed standard that you haven't already provided in response to the questions above, please provide them here.

Yes

No

Comments:

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Please use this form to submit comments on the 1st draft of the standards for Backup Facilities (Project 2006-04). Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "BF Standards" in the subject line. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

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

Background Information

The Backup Facilities Standard Drafting Team (SDT) is submitting these questions as part of its initial effort in revising EOP-008. Extensive revisions have been made to the existing standard. Many of these changes are a direct result of comments received from industry and from FERC Order 693.

The SDT is attempting to come up with practical limits as to which Transmission Operators (TOPs) need to be covered by this standard. This is to avoid placing undue burdens on small entities that would not have a deleterious effect on the reliability of the Interconnection. In that same vein, the SDT is allowing TOPs and BAs to provide needed backup functionality through third-party contract services. Again, this is an effort to reduce the burden on these entities without adversely impacting reliability.

The SDT has not included the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard. This position is in conflict with a directive in FERC Order 693. The SDT has discussed this issue at length and has been unable to come up with a reliability-based reason for centrally dispatched GOP inclusion. However, this position will need to be defended at FERC when this standard is filed. Along those lines, the SDT is working on a position paper outlining the reasons for this approach. A specific question has been included on this topic with a direct request for inputs from GOPs. In general, the SDT must provide an alternative approach that presents an equally effective and efficient solution to the one proposed in FERC Order 693. This could include items such as suggesting strengthening other standards, presenting business practices that may be followed now that would preclude the need for a backup control center, lesser cost alternatives, etc.

The SDT has also established timeframes for when backup capability must be available. These time frames are different for Reliability Coordinators (RCs) versus TOPs and BAs. Specific questions asking for feedback on these times have been included below. In addition, questions related to times involved for testing and re-establishment of primary/backup capability have been raised.

The Backup Facilities Standard Drafting Team would like to receive industry comments on this revised standard. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "BF Standards" by **March 7, 2008**.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

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

1. The SDT has attempted to limit the applicability provisions for Transmission Operators in this standard. Do you agree with this limitation? If not, please provide the reasons and alternatives.

Yes

No

Comments: ATC does not understand the SDT's motivation for limiting the scope of the proposed Standard to Transmission Operators (TOPs) with control of Facilities that are designated as Critical Assets or with defined Interconnection Reliability Operating Limits. The proposed accountability is a step backward from existing Reliability Standards and has the potential to expose the grid to greater reliability related risks following the loss of a non-applicable TOP's control center.

What justification does the SDT provide to make such a major change to this reliability standard?

2. The SDT has decided not to include the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard at this time. The SDT believes that there are other equally efficient and effective methods for the GOPs to continue to fulfill their role in preserving the reliability of the Interconnection following the loss of its control center. This position is contrary to a directive in FERC Order 693. The SDT will need to provide specific reasoning to FERC for adopting such an approach and is therefore, soliciting opinions from the industry. Do you agree with this approach? If not, please state the reasons and suggest an alternative. The SDT is particularly interested in receiving inputs from GOPs as to how they currently handle such a situation.

Yes

No

Comments: Generation is critical to the reliable operation of the BPS and should be included. ATC believes that the a more appropriate exemption could be based on the MW controlled by the GOP.

ATC may be open to changing its position on this issue if strong information is presented to support this position.

3. Requirement R6 — Do you think that the 2-hour transition time frame for Reliability Coordinators is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: The proposed standard is weaker than the existing standard. ATC believes that the expected time should be one hour and, if exceeded, the plan should address how you are going to operate into the next hour. With a maximum time of 2 hours.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

4. Requirement R7, R8.1, and R8.2 — Do you think the 2 to 6-hour time frame for applicable Transmission Operators and Balancing Authorities is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: Should be the same as requirement 6.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

5. Requirement R12 — Do you think that implementation or testing operations for a minimum of two hours annually is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: The two hour testing is appropriate.

6. Requirement R13 — The SDT proposes that within 6 calendar months of having lost its primary control center or backup capability that an entity will have a plan in place for re-establishing backup capability. Is 6 calendar months appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: Six months is an excessive amount of time to have a plan for re-establishing backup capability. ATC believes that three months is a more appropriate amount of time.

Why does the SDT believe that six months is needed in order to develop a plan for re-establishing backup capability? ATC would say that establishing backup capability may take more than six months but to develop a plan should not take six months.

7. If you are aware of any regional variances that would be required as a result of this standard, or if you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement, please identify them here.

Yes

No

Comments:

8. If you have any other comments on the proposed standard that you haven't already provided in response to the questions above, please provide them here.

Yes

No

Comments: The standard introduces three new capitalized terms that are not defined in the Standard:

Operating Plan, Operating Process and Operating Procedure.

ATC does not agree with the creation of the three new terms and believes that the terms should be replaced with a more general statement; i.e. "plan, process or procedure" as follows:

R1:

Each RC, BA and TOP shall have a plan, process or procedure describing the manner in which it ensures reliable operations of the BES in the event that its primary control center becomes inoperable. This plan, process or procedure for backup functionality shall include the following:

R1.3

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

The plan, process or procedure shall document how the entity will maintain backup functionality current with the primary control center.

R1.4

The plan, process or procedure shall document how the decision for implementation is to be made:

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Please use this form to submit comments on the 1st draft of the standards for Backup Facilities (Project 2006-04). Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "BF Standards" in the subject line. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Crystal Musselman	
Organization:	Avista Corporation	
Telephone:	(509) 495-4083	
E-mail:	crystal.musselman@avistacorp.com	
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)	
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input checked="" type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input checked="" type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background Information

The Backup Facilities Standard Drafting Team (SDT) is submitting these questions as part of its initial effort in revising EOP-008. Extensive revisions have been made to the existing standard. Many of these changes are a direct result of comments received from industry and from FERC Order 693.

The SDT is attempting to come up with practical limits as to which Transmission Operators (TOPs) need to be covered by this standard. This is to avoid placing undue burdens on small entities that would not have a deleterious effect on the reliability of the Interconnection. In that same vein, the SDT is allowing TOPs and BAs to provide needed backup functionality through third-party contract services. Again, this is an effort to reduce the burden on these entities without adversely impacting reliability.

The SDT has not included the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard. This position is in conflict with a directive in FERC Order 693. The SDT has discussed this issue at length and has been unable to come up with a reliability-based reason for centrally dispatched GOP inclusion. However, this position will need to be defended at FERC when this standard is filed. Along those lines, the SDT is working on a position paper outlining the reasons for this approach. A specific question has been included on this topic with a direct request for inputs from GOPs. In general, the SDT must provide an alternative approach that presents an equally effective and efficient solution to the one proposed in FERC Order 693. This could include items such as suggesting strengthening other standards, presenting business practices that may be followed now that would preclude the need for a backup control center, lesser cost alternatives, etc.

The SDT has also established timeframes for when backup capability must be available. These time frames are different for Reliability Coordinators (RCs) versus TOPs and BAs. Specific questions asking for feedback on these times have been included below. In addition, questions related to times involved for testing and re-establishment of primary/backup capability have been raised.

The Backup Facilities Standard Drafting Team would like to receive industry comments on this revised standard. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "BF Standards" by **March 7, 2008**.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

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

1. The SDT has attempted to limit the applicability provisions for Transmission Operators in this standard. Do you agree with this limitation? If not, please provide the reasons and alternatives.

Yes

No

Comments:

2. The SDT has decided not to include the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard at this time. The SDT believes that there are other equally efficient and effective methods for the GOPs to continue to fulfill their role in preserving the reliability of the Interconnection following the loss of its control center. This position is contrary to a directive in FERC Order 693. The SDT will need to provide specific reasoning to FERC for adopting such an approach and is therefore, soliciting opinions from the industry. Do you agree with this approach? If not, please state the reasons and suggest an alternative. The SDT is particularly interested in receiving inputs from GOPs as to how they currently handle such a situation.

Yes

No

Comments:

3. Requirement R6 — Do you think that the 2-hour transition time frame for Reliability Coordinators is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

4. Requirement R7, R8.1, and R8.2 — Do you think the 2 to 6-hour time frame for applicable Transmission Operators and Balancing Authorities is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

5. Requirement R12 — Do you think that implementation or testing operations for a minimum of two hours annually is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

6. Requirement R13 — The SDT proposes that within 6 calendar months of having lost its primary control center or backup capability that an entity will have a plan in place for re-establishing backup capability. Is 6 calendar months appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: Change to 12 calendar months for a plan. Need wording to indicate you are specifically exempt from EOP-008 for a time period (24-36 months) for rebuilding your control center.

7. If you are aware of any regional variances that would be required as a result of this standard, or if you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement, please identify them here.

Yes

No

Comments:

8. If you have any other comments on the proposed standard that you haven't already provided in response to the questions above, please provide them here.

Yes

No

Comments: R8 requires further clarification.

R9 - Requirement 9 should be moved under Requirement 1. The relation between the annual review and approval and the 60-day update and approval is not clear.

R9.1 clarify to indicate "changes that effect the operating plan."

R10 remove - basically a restatement of R4. Additionally "...any aspect of the operation." encompasses aspects that would not be related to the reliability of the system but would be an aspect of the operation (i.e. filling out time sheets).

R11 - remove - This requirement seems to be in conflict with the purpose of R1 and R13.

R13- Recommended that this be changed to 1 year. If this actually happened, there will be other issues to consider which may be very complex and trying to make this decision in 6 months may apply undue pressure on the decision. We recommend exemption from EOP-008 until the completion of a plan to reestablish backup capability.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Please use this form to submit comments on the 1st draft of the standards for Backup Facilities (Project 2006-04). Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "BF Standards" in the subject line. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	J. Andrew Dodge / William Keagle / Ed Carmen	
Organization:	Baltimore Gas and Electric Company	
Telephone:	410-597-7289	
E-mail:	edward.j.carmen@bge.com	
NERC Region (check all Regions in which your company operates)	<input type="checkbox"/>	Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background Information

The Backup Facilities Standard Drafting Team (SDT) is submitting these questions as part of its initial effort in revising EOP-008. Extensive revisions have been made to the existing standard. Many of these changes are a direct result of comments received from industry and from FERC Order 693.

The SDT is attempting to come up with practical limits as to which Transmission Operators (TOPs) need to be covered by this standard. This is to avoid placing undue burdens on small entities that would not have a deleterious effect on the reliability of the Interconnection. In that same vein, the SDT is allowing TOPs and BAs to provide needed backup functionality through third-party contract services. Again, this is an effort to reduce the burden on these entities without adversely impacting reliability.

The SDT has not included the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard. This position is in conflict with a directive in FERC Order 693. The SDT has discussed this issue at length and has been unable to come up with a reliability-based reason for centrally dispatched GOP inclusion. However, this position will need to be defended at FERC when this standard is filed. Along those lines, the SDT is working on a position paper outlining the reasons for this approach. A specific question has been included on this topic with a direct request for inputs from GOPs. In general, the SDT must provide an alternative approach that presents an equally effective and efficient solution to the one proposed in FERC Order 693. This could include items such as suggesting strengthening other standards, presenting business practices that may be followed now that would preclude the need for a backup control center, lesser cost alternatives, etc.

The SDT has also established timeframes for when backup capability must be available. These time frames are different for Reliability Coordinators (RCs) versus TOPs and BAs. Specific questions asking for feedback on these times have been included below. In addition, questions related to times involved for testing and re-establishment of primary/backup capability have been raised.

The Backup Facilities Standard Drafting Team would like to receive industry comments on this revised standard. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "BF Standards" by **March 7, 2008**.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

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

1. The SDT has attempted to limit the applicability provisions for Transmission Operators in this standard. Do you agree with this limitation? If not, please provide the reasons and alternatives.

Yes

No

Comments: Under the Applicability Section 4.1.2; What is the official definition of "Critical Assets"? Are these the same as the Critical Assets identified in the CIP-002? There are situations where the Transmission Operators and the Transmission Owners are not the same entity. In this case, the Transmission Owner is responsible for identifying their Critical Assets under CIP-002 and there is no requirement that they share this list with their Transmission Operator. In this relationship, how would the Transmission Operator know what the Critical Assets are in their transmission zone?

Does the statement "with control of Facilities that are designated as Critical Assets" imply that this standard does not apply to Transmission Operators that do not have physical control of Facilities that are designated as Critical Assets?

As written, this standard would not apply to Transmission Owners who perform the Local Control Center function under the direction of a NERC registered Transmission Operator (although the LCC may actually control the facility designated as critical or associated with the IROL).

2. The SDT has decided not to include the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard at this time. The SDT believes that there are other equally efficient and effective methods for the GOPs to continue to fulfill their role in preserving the reliability of the Interconnection following the loss of its control center. This position is contrary to a directive in FERC Order 693. The SDT will need to provide specific reasoning to FERC for adopting such an approach and is therefore, soliciting opinions from the industry. Do you agree with this approach? If not, please state the reasons and suggest an alternative. The SDT is particularly interested in receiving inputs from GOPs as to how they currently handle such a situation.

Yes

No

Comments:

3. Requirement R6 — Do you think that the 2-hour transition time frame for Reliability Coordinators is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

4. Requirement R7, R8.1, and R8.2 — Do you think the 2 to 6-hour time frame for applicable Transmission Operators and Balancing Authorities is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: If greater than 2 hours, only if their plan includes processes that will ensure the situational awareness and control of facilities. We are unclear as to how this can be accomplished without someone physically being at the backup control center within the initial 2 hour period.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

5. Requirement R12 — Do you think that implementation or testing operations for a minimum of two hours annually is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: The requirement should state that all operating personnel should operate real-time at the backup facility for a minimum of 1 shift per year in order to stay proficient with the transition plan and the operations at the backup facility. This also provides more thorough testing of the equipment at the backup facility when the center is utilized for real-time operations.

6. Requirement R13 — The SDT proposes that within 6 calendar months of having lost its primary control center or backup capability that an entity will have a plan in place for re-establishing backup capability. Is 6 calendar months appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: What does "have a plan in place for re-establishing backup capability" mean? Does this mean a) - that the requirement is to have a plan to establish backup capability or b) - is the requirement to re-establish backup functionality within 6 months? If a) is the intent, 6 months is too long to only develop a plan. A temporary backup solution should be required much sooner than 6 months.

As written, R13 is not clear. Need to clarify R13 requirement. It is not clear that the RC, BA, and TO need to supply the backup plan 6 months PRIOR to the anticipated date that they expect the primary or backup control center to be inoperable. As stated, it could be supplied 6 months after the date that the functionality is lost.

7. If you are aware of any regional variances that would be required as a result of this standard, or if you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement, please identify them here.

Yes

No

Comments:

8. If you have any other comments on the proposed standard that you haven't already provided in response to the questions above, please provide them here.

Yes

No

Comments: R1.6 identification of roles for ALL involved personnel may be too prescriptive. Thinking of all the scenarios for a loss of control center, certain individuals may be playing different roles. We think it should say, "all operations personnel" rather than "all involved" to limit the scope of pre-defined roles so that individuals such as support personnel can be used to the maximum effectiveness.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

As written, R3 is not clear. Need to clarify the R3 requirement. It is not clear how the standard applies to those other entities that perform the BES Operations.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Please use this form to submit comments on the 1st draft of the standards for Backup Facilities (Project 2006-04). Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "BF Standards" in the subject line. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	TERRY DOERN	
Organization:	BONNEVILLE POWER ADMINSTRATION	
Telephone:	360-418-2341	
E-mail:	TLDOERN@bpa.gov	
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input checked="" type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input checked="" type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input checked="" type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background Information

The Backup Facilities Standard Drafting Team (SDT) is submitting these questions as part of its initial effort in revising EOP-008. Extensive revisions have been made to the existing standard. Many of these changes are a direct result of comments received from industry and from FERC Order 693.

The SDT is attempting to come up with practical limits as to which Transmission Operators (TOPs) need to be covered by this standard. This is to avoid placing undue burdens on small entities that would not have a deleterious effect on the reliability of the Interconnection. In that same vein, the SDT is allowing TOPs and BAs to provide needed backup functionality through third-party contract services. Again, this is an effort to reduce the burden on these entities without adversely impacting reliability.

The SDT has not included the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard. This position is in conflict with a directive in FERC Order 693. The SDT has discussed this issue at length and has been unable to come up with a reliability-based reason for centrally dispatched GOP inclusion. However, this position will need to be defended at FERC when this standard is filed. Along those lines, the SDT is working on a position paper outlining the reasons for this approach. A specific question has been included on this topic with a direct request for inputs from GOPs. In general, the SDT must provide an alternative approach that presents an equally effective and efficient solution to the one proposed in FERC Order 693. This could include items such as suggesting strengthening other standards, presenting business practices that may be followed now that would preclude the need for a backup control center, lesser cost alternatives, etc.

The SDT has also established timeframes for when backup capability must be available. These time frames are different for Reliability Coordinators (RCs) versus TOPs and BAs. Specific questions asking for feedback on these times have been included below. In addition, questions related to times involved for testing and re-establishment of primary/backup capability have been raised.

The Backup Facilities Standard Drafting Team would like to receive industry comments on this revised standard. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "BF Standards" by **March 7, 2008**.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

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

1. The SDT has attempted to limit the applicability provisions for Transmission Operators in this standard. Do you agree with this limitation? If not, please provide the reasons and alternatives.

Yes

No

Comments: If TOs have IROLs they must have the capability to monitor critical lines & transmission paths within critical time periods (20 minute for stability, 30 minutes for thermal). This may add the need for B/U control center.

Many smaller TOs with limited transmission do not impact the BES.

2. The SDT has decided not to include the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard at this time. The SDT believes that there are other equally efficient and effective methods for the GOPs to continue to fulfill their role in preserving the reliability of the Interconnection following the loss of its control center. This position is contrary to a directive in FERC Order 693. The SDT will need to provide specific reasoning to FERC for adopting such an approach and is therefore, soliciting opinions from the industry. Do you agree with this approach? If not, please state the reasons and suggest an alternative. The SDT is particularly interested in receiving inputs from GOPs as to how they currently handle such a situation.

Yes

No

Comments: A GOP must provide support to the BA to meet BAL standards during adverse power system conditions even when their primary control center is destroyed or not functional. Other options may be practical as long as they meet the reliability needs and meet NERC and regional standards.

3. Requirement R6 — Do you think that the 2-hour transition time frame for Reliability Coordinators is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

4. Requirement R7, R8.1, and R8.2 — Do you think the 2 to 6-hour time frame for applicable Transmission Operators and Balancing Authorities is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: For quiet periods of operation, 2-6 hours is adequate. However for challenging times (peak loads, storms, loss of major generation, operating near IROL or SOL limits) 2 hours is insufficient. In 2003, a company did not have situational

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

awareness visibility for 30-60 minutes with very adverse consequences. NERC, the SDT and NERC entities should consider these adverse situations occurring during loss of control center. Could recent disturbances this month be managed during the transition to their current backup control center?

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

5. Requirement R12 — Do you think that implementation or testing operations for a minimum of two hours annually is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: One specific change - "power sources" such as engine generators and UPS should be tested more often, weekly or monthly. In disturbances, control center EGs and UPS are often problematic.

Also, if the backup software systems must be up to date as mentioned in R1.3 how does a BA or TO know without testing?

Change the language to "adequately test all functions of the backup control center that are needed to replace the primary control center operation." For example:

- test AGC for two hours annually, or when changes that impact operation
- test voltage control for two hours.
- test power sources EG/UPS monthly

NERC CIP standards have requirements more frequent than annually that apply to backup control centers.

6. Requirement R13 — The SDT proposes that within 6 calendar months of having lost its primary control center or backup capability that an entity will have a plan in place for re-establishing backup capability. Is 6 calendar months appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: Having a plan in place within six months is reasonable if this includes getting budget approval for replacement. Having it functional within six months may prove difficult. EMS vendors have said they can complete a project in about 12-18 months. NERC should suggest or require that the backup be functional again in a specific time period such as 18-24 months after failure of the primary control center.

7. If you are aware of any regional variances that would be required as a result of this standard, or if you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement, please identify them here.

Yes

No

Comments: I don't know of any regional variation.

However, for some BAs & TOPs, operating Special Protection Schemes is a critical issue for reliability of the Bulk Electric System that may require a robust control center and backup control center. Additional requirements may be needed for managing SPS during all adverse power system conditions including loss of control center.

8. If you have any other comments on the proposed standard that you haven't already provided in response to the questions above, please provide them here.

Yes

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

No

Comments:

This is a good improvement for EOP-008.

if a BA or TOP has a "hot" back up site that is staffed 24/7, less prescribed testing or documentation is needed.

R1.3 - add a timeline to keep current, weekly or monthly. Daily would be too difficult.

R5 - "includes monitoring, control, logging, and alarming sufficient for maintaining compliance with all Reliability Standards applicable to BA & TO" .

ALL Reliability Standards is too broad.

An extreme example: Do we need monitoring of vegetation management at the backup control center? No. BAL standards for BAs - Yes.

Prepare a list of standards/requirements we must meet from the B/U site.

R10 language "backup capability that does not depend on the primary control center for any aspect of its operation" may force companies to buy a development system for the backup site. An EMS vendor may be able to provide development system on a temporary basis.

Change "any aspect of its real time operation"

R13 - Add a specific schedule for completion of backup control center functionality in addition to a plan. 2 years is reasonable.

Will utilities still be liable for sanctions and penalties during loss of control center incidents and especially the 2-6 hour transition? Please have NERC comment. This may change the business case for backup control center.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Please use this form to submit comments on the 1st draft of the standards for Backup Facilities (Project 2006-04). Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "BF Standards" in the subject line. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	John Appel	
Organization:	Chelan County PUD	
Telephone:	(509) 661-4705	
E-mail:	john.appel@chelanpud.org	
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)	
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input checked="" type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input checked="" type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input checked="" type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input checked="" type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background Information

The Backup Facilities Standard Drafting Team (SDT) is submitting these questions as part of its initial effort in revising EOP-008. Extensive revisions have been made to the existing standard. Many of these changes are a direct result of comments received from industry and from FERC Order 693.

The SDT is attempting to come up with practical limits as to which Transmission Operators (TOPs) need to be covered by this standard. This is to avoid placing undue burdens on small entities that would not have a deleterious effect on the reliability of the Interconnection. In that same vein, the SDT is allowing TOPs and BAs to provide needed backup functionality through third-party contract services. Again, this is an effort to reduce the burden on these entities without adversely impacting reliability.

The SDT has not included the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard. This position is in conflict with a directive in FERC Order 693. The SDT has discussed this issue at length and has been unable to come up with a reliability-based reason for centrally dispatched GOP inclusion. However, this position will need to be defended at FERC when this standard is filed. Along those lines, the SDT is working on a position paper outlining the reasons for this approach. A specific question has been included on this topic with a direct request for inputs from GOPs. In general, the SDT must provide an alternative approach that presents an equally effective and efficient solution to the one proposed in FERC Order 693. This could include items such as suggesting strengthening other standards, presenting business practices that may be followed now that would preclude the need for a backup control center, lesser cost alternatives, etc.

The SDT has also established timeframes for when backup capability must be available. These time frames are different for Reliability Coordinators (RCs) versus TOPs and BAs. Specific questions asking for feedback on these times have been included below. In addition, questions related to times involved for testing and re-establishment of primary/backup capability have been raised.

The Backup Facilities Standard Drafting Team would like to receive industry comments on this revised standard. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "BF Standards" by **March 7, 2008**.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

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

1. The SDT has attempted to limit the applicability provisions for Transmission Operators in this standard. Do you agree with this limitation? If not, please provide the reasons and alternatives.

Yes

No

Comments:

2. The SDT has decided not to include the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard at this time. The SDT believes that there are other equally efficient and effective methods for the GOPs to continue to fulfill their role in preserving the reliability of the Interconnection following the loss of its control center. This position is contrary to a directive in FERC Order 693. The SDT will need to provide specific reasoning to FERC for adopting such an approach and is therefore, soliciting opinions from the industry. Do you agree with this approach? If not, please state the reasons and suggest an alternative. The SDT is particularly interested in receiving inputs from GOPs as to how they currently handle such a situation.

Yes

No

Comments: Our generation facilities do have procedures for maintaining operations in the event of a loss of control system functionality, however this does not involve relocating to different facilities.

3. Requirement R6 — Do you think that the 2-hour transition time frame for Reliability Coordinators is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: 2 hours is a long time to be without a Reliability Coordinator function in the case of an emergency. I believe WECC plans to have the two Reliability Coordinators be a backup for each other with duplicate capabilities.

4. Requirement R7, R8.1, and R8.2 — Do you think the 2 to 6-hour time frame for applicable Transmission Operators and Balancing Authorities is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: 6 hours is a long time, however I know that some utilities have to travel long distances to their backup control center. It is difficult to imagine a scenario where we wouldn't be able to be up and running in less than 1 hour.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

5. Requirement R12 — Do you think that implementation or testing operations for a minimum of two hours annually is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

6. Requirement R13 — The SDT proposes that within 6 calendar months of having lost its primary control center or backup capability that an entity will have a plan in place for re-establishing backup capability. Is 6 calendar months appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: 6 months to develop a plan? No timeframe to have lost control facilities operational? Why have a requirement? Perhaps developing a plan in 3 months or less and demonstrating progress according to schedule to restore lost control functionality - or something like that.

7. If you are aware of any regional variances that would be required as a result of this standard, or if you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement, please identify them here.

Yes

No

Comments:

8. If you have any other comments on the proposed standard that you haven't already provided in response to the questions above, please provide them here.

Yes

No

Comments: We suggest the following for R10: Replace "for any aspect of its operation" with "any functionality required to maintain compliance with all applicable reliability standards".

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Please use this form to submit comments on the 1st draft of the standards for Backup Facilities (Project 2006-04). Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "BF Standards" in the subject line. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Eduardo Paredes González	
Organization:	CFE	
Telephone:	011-52-686-558-15-02	
E-mail:	eduardo.paredes@cfe.gob.mx	
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)	
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input checked="" type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input checked="" type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input checked="" type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background Information

The Backup Facilities Standard Drafting Team (SDT) is submitting these questions as part of its initial effort in revising EOP-008. Extensive revisions have been made to the existing standard. Many of these changes are a direct result of comments received from industry and from FERC Order 693.

The SDT is attempting to come up with practical limits as to which Transmission Operators (TOPs) need to be covered by this standard. This is to avoid placing undue burdens on small entities that would not have a deleterious effect on the reliability of the Interconnection. In that same vein, the SDT is allowing TOPs and BAs to provide needed backup functionality through third-party contract services. Again, this is an effort to reduce the burden on these entities without adversely impacting reliability.

The SDT has not included the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard. This position is in conflict with a directive in FERC Order 693. The SDT has discussed this issue at length and has been unable to come up with a reliability-based reason for centrally dispatched GOP inclusion. However, this position will need to be defended at FERC when this standard is filed. Along those lines, the SDT is working on a position paper outlining the reasons for this approach. A specific question has been included on this topic with a direct request for inputs from GOPs. In general, the SDT must provide an alternative approach that presents an equally effective and efficient solution to the one proposed in FERC Order 693. This could include items such as suggesting strengthening other standards, presenting business practices that may be followed now that would preclude the need for a backup control center, lesser cost alternatives, etc.

The SDT has also established timeframes for when backup capability must be available. These time frames are different for Reliability Coordinators (RCs) versus TOPs and BAs. Specific questions asking for feedback on these times have been included below. In addition, questions related to times involved for testing and re-establishment of primary/backup capability have been raised.

The Backup Facilities Standard Drafting Team would like to receive industry comments on this revised standard. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "BF Standards" by **March 7, 2008**.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

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

1. The SDT has attempted to limit the applicability provisions for Transmission Operators in this standard. Do you agree with this limitation? If not, please provide the reasons and alternatives.

Yes

No

Comments: As long as the requirements in this standard are applicable to any transmission operator whose systems can impact reliability of the BES and not just registered TOPs.

2. The SDT has decided not to include the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard at this time. The SDT believes that there are other equally efficient and effective methods for the GOPs to continue to fulfill their role in preserving the reliability of the Interconnection following the loss of its control center. This position is contrary to a directive in FERC Order 693. The SDT will need to provide specific reasoning to FERC for adopting such an approach and is therefore, soliciting opinions from the industry. Do you agree with this approach? If not, please state the reasons and suggest an alternative. The SDT is particularly interested in receiving inputs from GOPs as to how they currently handle such a situation.

Yes

No

Comments:

3. Requirement R6 — Do you think that the 2-hour transition time frame for Reliability Coordinators is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: Because Reliability Coordinators have to be as soon as possibly ready to coordinate the diferents Control Areas

4. Requirement R7, R8.1, and R8.2 — Do you think the 2 to 6-hour time frame for applicable Transmission Operators and Balancing Authorities is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

5. Requirement R12 — Do you think that implementation or testing operations for a minimum of two hours annually is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: If the assumption applies to the implementation or testing operations of the backup center and not each individual.

6. Requirement R13 — The SDT proposes that within 6 calendar months of having lost its primary control center or backup capability that an entity will have a plan in place for re-establishing backup capability. Is 6 calendar months appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: 6 months is reasonable and makes its clear of the requirement that has not been available in the past.

7. If you are aware of any regional variances that would be required as a result of this standard, or if you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement, please identify them here.

Yes

No

Comments: Not aware of any at this time

8. If you have any other comments on the proposed standard that you haven't already provided in response to the questions above, please provide them here.

Yes

No

Comments:

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Please use this form to submit comments on the 1st draft of the standards for Backup Facilities (Project 2006-04). Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "BF Standards" in the subject line. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Jack Kerr	
Organization:	Dominion Virginia Power	
Telephone:	804-273-3393	
E-mail:	jack.kerr@dom.com	
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input checked="" type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background Information

The Backup Facilities Standard Drafting Team (SDT) is submitting these questions as part of its initial effort in revising EOP-008. Extensive revisions have been made to the existing standard. Many of these changes are a direct result of comments received from industry and from FERC Order 693.

The SDT is attempting to come up with practical limits as to which Transmission Operators (TOPs) need to be covered by this standard. This is to avoid placing undue burdens on small entities that would not have a deleterious effect on the reliability of the Interconnection. In that same vein, the SDT is allowing TOPs and BAs to provide needed backup functionality through third-party contract services. Again, this is an effort to reduce the burden on these entities without adversely impacting reliability.

The SDT has not included the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard. This position is in conflict with a directive in FERC Order 693. The SDT has discussed this issue at length and has been unable to come up with a reliability-based reason for centrally dispatched GOP inclusion. However, this position will need to be defended at FERC when this standard is filed. Along those lines, the SDT is working on a position paper outlining the reasons for this approach. A specific question has been included on this topic with a direct request for inputs from GOPs. In general, the SDT must provide an alternative approach that presents an equally effective and efficient solution to the one proposed in FERC Order 693. This could include items such as suggesting strengthening other standards, presenting business practices that may be followed now that would preclude the need for a backup control center, lesser cost alternatives, etc.

The SDT has also established timeframes for when backup capability must be available. These time frames are different for Reliability Coordinators (RCs) versus TOPs and BAs. Specific questions asking for feedback on these times have been included below. In addition, questions related to times involved for testing and re-establishment of primary/backup capability have been raised.

The Backup Facilities Standard Drafting Team would like to receive industry comments on this revised standard. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "BF Standards" by **March 7, 2008**.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

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

1. The SDT has attempted to limit the applicability provisions for Transmission Operators in this standard. Do you agree with this limitation? If not, please provide the reasons and alternatives.

Yes

No

Comments: Dominion Virginia Power (DVP) believes that requirement 4.1.2, as written, is unenforceable and unmeasurable. There may be a more reasonable way to limit the impact to smaller Transmission Operators (TOPs). This could easily be handled in the rules of registration for TOPs. Alternatively, there is a process to request waivers from NERC standards that could be used to solve this issue.

2. The SDT has decided not to include the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard at this time. The SDT believes that there are other equally efficient and effective methods for the GOPs to continue to fulfill their role in preserving the reliability of the Interconnection following the loss of its control center. This position is contrary to a directive in FERC Order 693. The SDT will need to provide specific reasoning to FERC for adopting such an approach and is therefore, soliciting opinions from the industry. Do you agree with this approach? If not, please state the reasons and suggest an alternative. The SDT is particularly interested in receiving inputs from GOPs as to how they currently handle such a situation.

Yes

No

Comments: DVP agrees with this approach. Generator Operators only follow directions issued by Reliability Functions - Reliability Coordinators (RC), Balancing Authorities (BA) and Transmission Operators (TOP). DVP believes that this standard does not need to apply to Generator Operators (GOP) with a central dispatch function as long as there are no gaps in the Reliability Function's ability to communicate with generation assets.

Other reasons for not including GOP's in this standard are:

- 1.) the diverse nature and sheer number of generators, each already required to contribute to system reliability deficiencies (e.g., AVR response), as opposed to having only one Reliability Coordinator control room, for example. Any reliability deficiency caused by the loss of any single GOP control room or plant would simply be "made up" by other GOPs in the area.
- 2.) the various contributions to the Bulk Electric System of each generator must be taken into account. Some generators run when commercially contracted, others provide imbalance and regulation services, some are contracted to be "Must Run" units, yet others provide peaking capabilities. A "One Size Fits All" approach to requiring GOP BUCCs suggests inefficient and ineffective reliability requirements, and
- 3.) the "hands on" nature of large (500+MW) generating plants essentially prevents operation from a remote location

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

3. Requirement R6 — Do you think that the 2-hour transition time frame for Reliability Coordinators is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: The term 'transition period' is ill-defined by the parenthetical expression that follows it. This leaves us unable to render an opinion. The parenthetical expression included in R6 should be broken out, more precisely defined, and placed in the standard as a measure for R6.

4. Requirement R7, R8.1, and R8.2 — Do you think the 2 to 6-hour time frame for applicable Transmission Operators and Balancing Authorities is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: DVP believes R8.1 and R8.2 are not appropriate subrequirements of Requirement 8 since they pertain to required functionality in the transition period while R8 pertains to a requirement for a notification list. We also believes that all functional entities subject to this standard in its current form should have a two hour transition period. As currently written, R8.1 and R8.2 are essentially unmeasurable.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

5. Requirement R12 — Do you think that implementation or testing operations for a minimum of two hours annually is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: DVP believes that R12 is more appropriate as a measure for R6, and the number of required hours to test the plan is immaterial to reliability.

6. Requirement R13 — The SDT proposes that within 6 calendar months of having lost its primary control center or backup capability that an entity will have a plan in place for re-establishing backup capability. Is 6 calendar months appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: This requirement is construed as attempting to give an entity an automatic waiver from R1 through R12 of this standard, following a catastrophic loss of its primary or backup control center (BUCC) that is a force majeure event. As written, it does not accomplish that goal. For example, what about the scenario where a primary control center is uninhabitable for longer than 2 hours? Is that entity immediately non-compliant for this standard for having no backup for its BUCC?

7. If you are aware of any regional variances that would be required as a result of this standard, or if you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement, please identify them here.

Yes

No

Comments:

8. If you have any other comments on the proposed standard that you haven't already provided in response to the questions above, please provide them here.

Yes

No

Comments: 1) There are no measures for the above requirements - therefore it is difficult to evaluate the impacts of their applicability. For example, the definition of what starts the transition period and what ends the transition period to the backup control center should be included in the standard.

2) Regarding R11 - what is an "indefinite period of time" and what would be a reasonable measure?

3) Regarding R4 and R5 - Not all requirements are created equal - some real-time operating requirements are essential to be backed up.

4) A general comment is that this standard, taken as a whole, appears to include "how" language. Requirements should be limited to "what" is required. Much of what is included in this standard appears to be "good utility practice" and not reliability requirements and should be stripped from the standard.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Please use this form to submit comments on the 1st draft of the standards for Backup Facilities (Project 2006-04). Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "BF Standards" in the subject line. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

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

Background Information

The Backup Facilities Standard Drafting Team (SDT) is submitting these questions as part of its initial effort in revising EOP-008. Extensive revisions have been made to the existing standard. Many of these changes are a direct result of comments received from industry and from FERC Order 693.

The SDT is attempting to come up with practical limits as to which Transmission Operators (TOPs) need to be covered by this standard. This is to avoid placing undue burdens on small entities that would not have a deleterious effect on the reliability of the Interconnection. In that same vein, the SDT is allowing TOPs and BAs to provide needed backup functionality through third-party contract services. Again, this is an effort to reduce the burden on these entities without adversely impacting reliability.

The SDT has not included the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard. This position is in conflict with a directive in FERC Order 693. The SDT has discussed this issue at length and has been unable to come up with a reliability-based reason for centrally dispatched GOP inclusion. However, this position will need to be defended at FERC when this standard is filed. Along those lines, the SDT is working on a position paper outlining the reasons for this approach. A specific question has been included on this topic with a direct request for inputs from GOPs. In general, the SDT must provide an alternative approach that presents an equally effective and efficient solution to the one proposed in FERC Order 693. This could include items such as suggesting strengthening other standards, presenting business practices that may be followed now that would preclude the need for a backup control center, lesser cost alternatives, etc.

The SDT has also established timeframes for when backup capability must be available. These time frames are different for Reliability Coordinators (RCs) versus TOPs and BAs. Specific questions asking for feedback on these times have been included below. In addition, questions related to times involved for testing and re-establishment of primary/backup capability have been raised.

The Backup Facilities Standard Drafting Team would like to receive industry comments on this revised standard. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "BF Standards" by **March 7, 2008**.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

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

1. The SDT has attempted to limit the applicability provisions for Transmission Operators in this standard. Do you agree with this limitation? If not, please provide the reasons and alternatives.

Yes

No

Comments: We support comments submitted by the SERC Operating Committee Standards Review Group (SOCSRG). They stated that they "believe that requirement 4.1.2, as written, is unenforceable and unmeasurable. There may be a more reasonable way to limit the impact to smaller Transmission Operators (TOPs). This could easily be handled in the rules of registration for TOPs. Alternatively, there is a process to request waivers from NERC standards that could be used to solve this issue."

2. The SDT has decided not to include the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard at this time. The SDT believes that there are other equally efficient and effective methods for the GOPs to continue to fulfill their role in preserving the reliability of the Interconnection following the loss of its control center. This position is contrary to a directive in FERC Order 693. The SDT will need to provide specific reasoning to FERC for adopting such an approach and is therefore, soliciting opinions from the industry. Do you agree with this approach? If not, please state the reasons and suggest an alternative. The SDT is particularly interested in receiving inputs from GOPs as to how they currently handle such a situation.

Yes

No

Comments: In Order 693, FERC stated that the goal of the Reliability Standard is the continuation of reliable operations and the maintenance of situational awareness in the event that the primary control center is no longer operational. They further stated that "Other entities, including balancing authorities, transmission operators and centrally dispatched generation control centers, must provide for the minimum backup capabilities discussed above but may do so through other means, such as contracting for these services instead of through dedicated backup control centers." Given that the impact to reliability can vary depending on many diverse factors including; size of owner's asset base, NERC region, ISO/RTO or market rules, etc. we support the standard as written. Each region can, through its standards development process, place additional requirements if it deems necessary. Each RTO/ISO or market, through its stakeholder process, can also impose additional requirements upon its participants if it deems necessary. We further state that we support comments submitted by the SERC Operating Committee Standards Review Group (SOCSRG).

3. Requirement R6 — Do you think that the 2-hour transition time frame for Reliability Coordinators is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Comments: We support comments submitted by the SERC Operating Committee Standards Review Group (SOCSRG). They stated "The term 'transition period' is ill-defined by the parenthetical expression that follows it. This leaves the SOCSRG unable to render an opinion. The parenthetical expression included in R6 should be broken out, more precisely defined, and placed in the standard as a measure for R6."

4. Requirement R7, R8.1, and R8.2 — Do you think the 2 to 6-hour time frame for applicable Transmission Operators and Balancing Authorities is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: We support comments submitted by the SERC Operating Committee Standards Review Group (SOCSRG). They stated "The SOCSRG believes R8.1 and R8.2 are not appropriate subrequirements of Requirement 8 since they pertain to required functionality in the transition period while R8 pertains to a requirement for a notification list. The SOCSRG also believes that all functional entities subject to this standard in its current form should have a two hour transition period. As currently written, R8.1 and R8.2 are essentially unmeasurable. "

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

5. Requirement R12 — Do you think that implementation or testing operations for a minimum of two hours annually is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: We support comments submitted by the SERC Operating Committee Standards Review Group (SOCSRG). They stated "The SOCSRG believes that R12 is more appropriate as a measure for R6 and the number of required hours to test the plan is immaterial to reliability "

6. Requirement R13 — The SDT proposes that within 6 calendar months of having lost its primary control center or backup capability that an entity will have a plan in place for re-establishing backup capability. Is 6 calendar months appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: We support comments submitted by the SERC Operating Committee Standards Review Group (SOCSRG). They stated "This requirement is construed as attempting to give an entity an automatic waiver from R1 through R12 of this standard, following a catastrophic loss of its primary or backup control center (BUCC) that is a force majeure event. As written, it does not accomplish that goal. For example, what about the scenario where a primary control center is uninhabitable for longer than 2 hours? Is that entity immediately non compliant for this standard for having no backup for its BUCC?

7. If you are aware of any regional variances that would be required as a result of this standard, or if you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement, please identify them here.

Yes

No

Comments:

8. If you have any other comments on the proposed standard that you haven't already provided in response to the questions above, please provide them here.

Yes

No

Comments: We support comments submitted by the SERC Operating Committee Standards Review Group (SOCSRG). They stated "There are no measures for the above requirements - therefore it is difficult to evaluate the impacts of their applicability. For example, the definition of what starts the transition period and what ends the transition period to the backup control center should be included in the standard.

Regarding R11 - what is an "indefinite period of time" and what would be a reasonable measure?

Regarding R4 and R5 - Not all requirements are created equal - some real-time operating requirements are essential to be backed up.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

A general comment by the SOCSRG that this standard, taken as a whole, appears to include "how" language. Requirements should be limited to "what" is required. Much of what is included in this standard appears to be "good utility practice" and not reliability requirements and should be stripped from the standard.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Please use this form to submit comments on the 1st draft of the standards for Backup Facilities (Project 2006-04). Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "BF Standards" in the subject line. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Daniel Herring
Organization:	Detroit Edison Company
Telephone:	313-235-5365
E-mail:	herringd@dteenergy.com
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/> 2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input checked="" type="checkbox"/> 3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input checked="" type="checkbox"/> 4 — Transmission-dependent Utilities
<input checked="" type="checkbox"/> RFC	<input checked="" type="checkbox"/> 5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/> 6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/> 7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/> 8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/> 9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/> 10 — Regional Reliability Organizations and Regional Entities

Background Information

The Backup Facilities Standard Drafting Team (SDT) is submitting these questions as part of its initial effort in revising EOP-008. Extensive revisions have been made to the existing standard. Many of these changes are a direct result of comments received from industry and from FERC Order 693.

The SDT is attempting to come up with practical limits as to which Transmission Operators (TOPs) need to be covered by this standard. This is to avoid placing undue burdens on small entities that would not have a deleterious effect on the reliability of the Interconnection. In that same vein, the SDT is allowing TOPs and BAs to provide needed backup functionality through third-party contract services. Again, this is an effort to reduce the burden on these entities without adversely impacting reliability.

The SDT has not included the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard. This position is in conflict with a directive in FERC Order 693. The SDT has discussed this issue at length and has been unable to come up with a reliability-based reason for centrally dispatched GOP inclusion. However, this position will need to be defended at FERC when this standard is filed. Along those lines, the SDT is working on a position paper outlining the reasons for this approach. A specific question has been included on this topic with a direct request for inputs from GOPs. In general, the SDT must provide an alternative approach that presents an equally effective and efficient solution to the one proposed in FERC Order 693. This could include items such as suggesting strengthening other standards, presenting business practices that may be followed now that would preclude the need for a backup control center, lesser cost alternatives, etc.

The SDT has also established timeframes for when backup capability must be available. These time frames are different for Reliability Coordinators (RCs) versus TOPs and BAs. Specific questions asking for feedback on these times have been included below. In addition, questions related to times involved for testing and re-establishment of primary/backup capability have been raised.

The Backup Facilities Standard Drafting Team would like to receive industry comments on this revised standard. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "BF Standards" by **March 7, 2008**.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

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

1. The SDT has attempted to limit the applicability provisions for Transmission Operators in this standard. Do you agree with this limitation? If not, please provide the reasons and alternatives.

Yes

No

Comments: I do not agree with this limitation. I would agree with this approach if there was one risk-based assessment methodology used by all Transmission Operator entities to identify their Critical Assets.

2. The SDT has decided not to include the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard at this time. The SDT believes that there are other equally efficient and effective methods for the GOPs to continue to fulfill their role in preserving the reliability of the Interconnection following the loss of its control center. This position is contrary to a directive in FERC Order 693. The SDT will need to provide specific reasoning to FERC for adopting such an approach and is therefore, soliciting opinions from the industry. Do you agree with this approach? If not, please state the reasons and suggest an alternative. The SDT is particularly interested in receiving inputs from GOPs as to how they currently handle such a situation.

Yes

No

Comments: As energy markets mature and more generation assets are operated from central control centers, it is imperative for grid reliability, security, and stability that GOPs be able to fulfill their roles. Not having GOPs identified as applicable entities to a reliability standard addressing loss of control center functionality misses the intent of this standard.

3. Requirement R6 — Do you think that the 2-hour transition time frame for Reliability Coordinators is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

4. Requirement R7, R8.1, and R8.2 — Do you think the 2 to 6-hour time frame for applicable Transmission Operators and Balancing Authorities is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

5. Requirement R12 — Do you think that implementation or testing operations for a minimum of two hours annually is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

6. Requirement R13 — The SDT proposes that within 6 calendar months of having lost its primary control center or backup capability that an entity will have a plan in place for re-establishing backup capability. Is 6 calendar months appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

7. If you are aware of any regional variances that would be required as a result of this standard, or if you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement, please identify them here.

Yes

No

Comments: Previously identified FERC Order 693.

8. If you have any other comments on the proposed standard that you haven't already provided in response to the questions above, please provide them here.

Yes

No

Comments: We would recommend that language for annual training for the operating personnel be included in the standard with a walkthrough and start up of the facility being the minimum.

We feel the six calendar month language in R13 is to long of a time period.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Please use this form to submit comments on the 1st draft of the standards for Backup Facilities (Project 2006-04). Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "BF Standards" in the subject line. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Greg Rowland	
Organization:	Duke Energy	
Telephone:	704-382-5348	
E-mail:	gdrowland@dukeenergy.com	
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input checked="" type="checkbox"/> RFC	<input checked="" type="checkbox"/>	5 — Electric Generators
<input checked="" type="checkbox"/> SERC	<input checked="" type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background Information

The Backup Facilities Standard Drafting Team (SDT) is submitting these questions as part of its initial effort in revising EOP-008. Extensive revisions have been made to the existing standard. Many of these changes are a direct result of comments received from industry and from FERC Order 693.

The SDT is attempting to come up with practical limits as to which Transmission Operators (TOPs) need to be covered by this standard. This is to avoid placing undue burdens on small entities that would not have a deleterious effect on the reliability of the Interconnection. In that same vein, the SDT is allowing TOPs and BAs to provide needed backup functionality through third-party contract services. Again, this is an effort to reduce the burden on these entities without adversely impacting reliability.

The SDT has not included the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard. This position is in conflict with a directive in FERC Order 693. The SDT has discussed this issue at length and has been unable to come up with a reliability-based reason for centrally dispatched GOP inclusion. However, this position will need to be defended at FERC when this standard is filed. Along those lines, the SDT is working on a position paper outlining the reasons for this approach. A specific question has been included on this topic with a direct request for inputs from GOPs. In general, the SDT must provide an alternative approach that presents an equally effective and efficient solution to the one proposed in FERC Order 693. This could include items such as suggesting strengthening other standards, presenting business practices that may be followed now that would preclude the need for a backup control center, lesser cost alternatives, etc.

The SDT has also established timeframes for when backup capability must be available. These time frames are different for Reliability Coordinators (RCs) versus TOPs and BAs. Specific questions asking for feedback on these times have been included below. In addition, questions related to times involved for testing and re-establishment of primary/backup capability have been raised.

The Backup Facilities Standard Drafting Team would like to receive industry comments on this revised standard. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "BF Standards" by **March 7, 2008**.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

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

1. The SDT has attempted to limit the applicability provisions for Transmission Operators in this standard. Do you agree with this limitation? If not, please provide the reasons and alternatives.

Yes

No

Comments: The limitation doesn't make sense and would be difficult to enforce, since Critical Asset lists and defined IROLs will change over time. Applicability should be on the basis of NERC Registration, to avoid an ongoing tangled mass of exceptions. For example, a TOP with control over a limited number of facilities should still be required to provide backup functionality, however backup functionality can be provided in other ways than constructing backup facilities.

2. The SDT has decided not to include the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard at this time. The SDT believes that there are other equally efficient and effective methods for the GOPs to continue to fulfill their role in preserving the reliability of the Interconnection following the loss of its control center. This position is contrary to a directive in FERC Order 693. The SDT will need to provide specific reasoning to FERC for adopting such an approach and is therefore, soliciting opinions from the industry. Do you agree with this approach? If not, please state the reasons and suggest an alternative. The SDT is particularly interested in receiving inputs from GOPs as to how they currently handle such a situation.

Yes

No

Comments: As FERC noted in Order No. 693, generator operators who have operational control over significant amounts of generation are important to the reliability of the Bulk Power System. As such they should provide backup capabilities that are independent of the primary control center, can operate for a prolonged period of time, and provide for a minimum functionality to replicate the critical reliability functions of the primary control center. The reason BAs are required to have backup functionality is that BAs have direct communications (both data and voice) with generator sites and generator personnel. These are the front lines of operational situations. It is vital that we maintain these links in both normal, emergency conditions, and backup mode conditions.

3. Requirement R6 — Do you think that the 2-hour transition time frame for Reliability Coordinators is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: 2 hours may be reasonable, however R6 is an ambiguous requirement. It is unclear exactly what the 2-hour transition period is referring to. It may not always be possible to establish an exactly precise point in time when primary control center functionality was lost. Likewise, it may not always be possible to define an exact point in time when backup functionality is "up and running". Furthermore, it is unclear

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

whether this is just a requirement to have an appropriate 2-hour plan, or whether it is a requirement to always meet the 2-hour time limit, whether for tests or actual activation.

4. Requirement R7, R8.1, and R8.2 — Do you think the 2 to 6-hour time frame for applicable Transmission Operators and Balancing Authorities is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: 6 hours is far too long to get backup functionality up and running. TOP's and BA's should be on the same 2-hour clock as the Reliability Coordinator. TOPs and BAs have direct communications to field locations and personnel that are critical under normal and emergency conditions. Many RCs do not have this capability and depend on TOPs and BAs to provide this link to the capability on the ground.

See response to Comment #3 above. While we believe 2 hours may be reasonable, R7 like R6 is an ambiguous requirement. It is unclear exactly what the transition period is referring to. It may not always be possible to establish an exactly precise point in time when primary control center functionality was lost. Likewise, it may not always be possible to define an exact point in time when backup functionality is "up and running". Furthermore, it is unclear whether this is just a requirement to have an appropriate plan, or whether it is a requirement to always meet the time limit, whether for tests or actual activation.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

5. Requirement R12 — Do you think that implementation or testing operations for a minimum of two hours annually is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: A single test of 2 hours duration annually is of very limited value for system operators and the backup functionality. This significantly limits the number of system operators who experience backup control, but more importantly minimizes the capability testing of the backup control functionality. This is a very low hurdle. This requirement is also silent on backup control functionality training. Specific training should be included in the training standards.

6. Requirement R13 — The SDT proposes that within 6 calendar months of having lost its primary control center or backup capability that an entity will have a plan in place for re-establishing backup capability. Is 6 calendar months appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: This requirement seems reasonable, but needs more clarity. If the view of this requirement is that backup capability must be re-established within 6 months of the loss of primary functionality, we question whether it can be done, particularly in situations where the primary capability is totally destroyed. Furthermore, while an entity is in the backup facility, perhaps for 6 months or longer while the primary facility is being restored, there should be a clear exemption from having a "backup for the backup", since the need for such a facility would be a very low probability event. Similarly, if more than one entity plans to utilize the same backup facility they should not be found non-compliant when another entity is utilizing the facility. The SDT should provide more clarity and specificity around the exceptions from requirements in the standard for these types of situations.

7. If you are aware of any regional variances that would be required as a result of this standard, or if you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement, please identify them here.

Yes

No

Comments:

8. If you have any other comments on the proposed standard that you haven't already provided in response to the questions above, please provide them here.

Yes

No

Comments: The Purpose statement of this standard focuses on an event in which a control center becomes inoperable. Requirements then focus on providing "backup functionality" for a loss of primary control center functionality. The focus of the standard should be tightened up so that it is clear that entities are required to provide backup functionality that addresses loss of primary control center functionality.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

R10 requires that backup capability cannot depend on the primary control center for any aspect of its operation. This standard should more specific regarding how far "out" into the communications network infrastructure entities must assume the primary facility functionality reaches, for the purpose of establishing backup functionality.

R11 states that the backup capability must be capable of operating for an indefinite period of time. It's unclear how compliance will be determined for this requirement.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Please use this form to submit comments on the 1st draft of the standards for Backup Facilities (Project 2006-04). Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "BF Standards" in the subject line. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

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

Background Information

The Backup Facilities Standard Drafting Team (SDT) is submitting these questions as part of its initial effort in revising EOP-008. Extensive revisions have been made to the existing standard. Many of these changes are a direct result of comments received from industry and from FERC Order 693.

The SDT is attempting to come up with practical limits as to which Transmission Operators (TOPs) need to be covered by this standard. This is to avoid placing undue burdens on small entities that would not have a deleterious effect on the reliability of the Interconnection. In that same vein, the SDT is allowing TOPs and BAs to provide needed backup functionality through third-party contract services. Again, this is an effort to reduce the burden on these entities without adversely impacting reliability.

The SDT has not included the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard. This position is in conflict with a directive in FERC Order 693. The SDT has discussed this issue at length and has been unable to come up with a reliability-based reason for centrally dispatched GOP inclusion. However, this position will need to be defended at FERC when this standard is filed. Along those lines, the SDT is working on a position paper outlining the reasons for this approach. A specific question has been included on this topic with a direct request for inputs from GOPs. In general, the SDT must provide an alternative approach that presents an equally effective and efficient solution to the one proposed in FERC Order 693. This could include items such as suggesting strengthening other standards, presenting business practices that may be followed now that would preclude the need for a backup control center, lesser cost alternatives, etc.

The SDT has also established timeframes for when backup capability must be available. These time frames are different for Reliability Coordinators (RCs) versus TOPs and BAs. Specific questions asking for feedback on these times have been included below. In addition, questions related to times involved for testing and re-establishment of primary/backup capability have been raised.

The Backup Facilities Standard Drafting Team would like to receive industry comments on this revised standard. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "BF Standards" by **March 7, 2008**.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

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

1. The SDT has attempted to limit the applicability provisions for Transmission Operators in this standard. Do you agree with this limitation? If not, please provide the reasons and alternatives.

Yes

No

Comments: The attempt to limit the Transmission Operators subject to this standard opens many more questions and issues that are not addressed. The argument could also be made by some BAs that they have no critical assets or other reliability impact and thus desire an exclusion.

2. The SDT has decided not to include the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard at this time. The SDT believes that there are other equally efficient and effective methods for the GOPs to continue to fulfill their role in preserving the reliability of the Interconnection following the loss of its control center. This position is contrary to a directive in FERC Order 693. The SDT will need to provide specific reasoning to FERC for adopting such an approach and is therefore, soliciting opinions from the industry. Do you agree with this approach? If not, please state the reasons and suggest an alternative. The SDT is particularly interested in receiving inputs from GOPs as to how they currently handle such a situation.

Yes

No

Comments: It appears to be appropriate to exclude centrally dispatched control centers for generators if they do not perform the functions of or part of the functions of a BA. The means for executing dispatch for a unit is a business decision. If the dispatch operator is not performing any BA functions then there is no need for this standard to apply and whatever other standards or rules for maintaining communication between the unit and BA would apply.

3. Requirement R6 — Do you think that the 2-hour transition time frame for Reliability Coordinators is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: 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.

4. Requirement R7, R8.1, and R8.2 — Do you think the 2 to 6-hour time frame for applicable Transmission Operators and Balancing Authorities is appropriate? If not, please state the reasons and suggest an alternative.

Yes

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

No

Comments: 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

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

5. Requirement R12 — Do you think that implementation or testing operations for a minimum of two hours annually is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: It is not apparent as to the basis for this number. Is it arbitrary or based on some technical concern? State as such. Otherwise, the testing should be of adequate length to test the back up functions, whether it be 30 minutes or 12 hours would be dependent upon the entity's desires.

6. Requirement R13 — The SDT proposes that within 6 calendar months of having lost its primary control center or backup capability that an entity will have a plan in place for re-establishing backup capability. Is 6 calendar months appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

Recommend a shorter time time frame such as within 30 days, and updated every 30 days until back up capability is restored. 6 months is too long for an entity to not have a plan for continuing operations if its primary or back up facility are unavailable. The plan itself may take longer than 6 months to complete.

7. If you are aware of any regional variances that would be required as a result of this standard, or if you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement, please identify them here.

Yes

No

Comments:

8. If you have any other comments on the proposed standard that you haven't already provided in response to the questions above, please provide them here.

Yes

No

Comments:

Consider adding provisions for short term planned and unplanned outages on either the primary or back up control center. This would be similar to outage "time clocks" in the nuclear world. This would allow entities to make repairs, upgrades on the primary and back up control centers without automatically being non-compliant when conducting such activities.

An example might be that the primary or back up control center not be unavailable (definition needed?) for more than 7 cumulative days per quarter. Exceptions may be granted by the Regional Compliance Enforcement Authority.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Please use this form to submit comments on the 1st draft of the standards for Backup Facilities (Project 2006-04). Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "BF Standards" in the subject line. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Ed Davis
Organization:	Entergy Services
Telephone:	504-576-3029
E-mail:	edavis@entergy.xom
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/> 1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/> 2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/> 3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/> 4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/> 5 — Electric Generators
<input checked="" type="checkbox"/> SERC	<input type="checkbox"/> 6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/> 7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/> 8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/> 9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/> 10 — Regional Reliability Organizations and Regional Entities

Background Information

The Backup Facilities Standard Drafting Team (SDT) is submitting these questions as part of its initial effort in revising EOP-008. Extensive revisions have been made to the existing standard. Many of these changes are a direct result of comments received from industry and from FERC Order 693.

The SDT is attempting to come up with practical limits as to which Transmission Operators (TOPs) need to be covered by this standard. This is to avoid placing undue burdens on small entities that would not have a deleterious effect on the reliability of the Interconnection. In that same vein, the SDT is allowing TOPs and BAs to provide needed backup functionality through third-party contract services. Again, this is an effort to reduce the burden on these entities without adversely impacting reliability.

The SDT has not included the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard. This position is in conflict with a directive in FERC Order 693. The SDT has discussed this issue at length and has been unable to come up with a reliability-based reason for centrally dispatched GOP inclusion. However, this position will need to be defended at FERC when this standard is filed. Along those lines, the SDT is working on a position paper outlining the reasons for this approach. A specific question has been included on this topic with a direct request for inputs from GOPs. In general, the SDT must provide an alternative approach that presents an equally effective and efficient solution to the one proposed in FERC Order 693. This could include items such as suggesting strengthening other standards, presenting business practices that may be followed now that would preclude the need for a backup control center, lesser cost alternatives, etc.

The SDT has also established timeframes for when backup capability must be available. These time frames are different for Reliability Coordinators (RCs) versus TOPs and BAs. Specific questions asking for feedback on these times have been included below. In addition, questions related to times involved for testing and re-establishment of primary/backup capability have been raised.

The Backup Facilities Standard Drafting Team would like to receive industry comments on this revised standard. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "BF Standards" by **March 7, 2008**.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

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

1. The SDT has attempted to limit the applicability provisions for Transmission Operators in this standard. Do you agree with this limitation? If not, please provide the reasons and alternatives.

Yes

No

Comments: Entergy agrees with and supports the SOCRG comments. The SERC Operating Committee Standards Review Group (SOCSRG) believes that requirement 4.1.2, as written, is unenforceable and unmeasurable. There may be a more reasonable way to limit the impact to smaller Transmission Operators (TOPs). This could easily be handled in the rules of registration for TOPs. Alternatively, there is a process to request waivers from NERC standards that could be used to solve this issue.

2. The SDT has decided not to include the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard at this time. The SDT believes that there are other equally efficient and effective methods for the GOPs to continue to fulfill their role in preserving the reliability of the Interconnection following the loss of its control center. This position is contrary to a directive in FERC Order 693. The SDT will need to provide specific reasoning to FERC for adopting such an approach and is therefore, soliciting opinions from the industry. Do you agree with this approach? If not, please state the reasons and suggest an alternative. The SDT is particularly interested in receiving inputs from GOPs as to how they currently handle such a situation.

Yes

No

Comments: Entergy agrees with and supports the SOCSRG comments. The SOCSRG agrees with this approach. Generator Operators only follow directions issued by Reliability Functions - Reliability Coordinators (RC), Balancing Authorities (BA) and Transmission Operators (TOP). The SOCSRG believes that this standard does not need to apply to Generator Operators (GOP) with a central dispatch function as long as there are no gaps in the Reliability Function's ability to communicate with generation assets.

Other reasons for not including GOP's in this standard are:

- 1.) the diverse nature and sheer number of generators, each already required to contribute to system reliability deficiencies (e.g., AVR response), as opposed to having only one Reliability Coordinator control room, for example. Any reliability deficiency caused by the loss of any single GOP control room or plant would simply be "made up" by other GOPs in the area.
- 2.) the various contributions to the Bulk Electric System of each generator must be taken into account. Some generators run when commercially contracted, others provide imbalance and regulation services, some are contracted to be "Must Run" units, yet others provide peaking capabilities. A "One Size Fits All" approach to requiring GOP BUCCs suggests inefficient and ineffective reliability requirements, and
- 3.) the "hands on" nature of large (500+MW) generating plants essentially prevents operation from a remote location

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

3. Requirement R6 — Do you think that the 2-hour transition time frame for Reliability Coordinators is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: Entergy agrees with and supports the SOCRG comments. The term 'transition period' is ill-defined by the parenthetical expression that follows it. This leaves the SOCSRG unable to render an opinion. The parenthetical expression included in R6 should be broken out, more precisely defined, and placed in the standard as a measure for R6.

4. Requirement R7, R8.1, and R8.2 — Do you think the 2 to 6-hour time frame for applicable Transmission Operators and Balancing Authorities is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: Entergy agrees with and supports the SOCRG comments. The SOCSRG believes R8.1 and R8.2 are not appropriate subrequirements of Requirement 8 since they pertain to required functionality in the transition period while R8 pertains to a requirement for a notification list. The SOCSRG also believes that all functional entities subject to this standard in its current form should have a two hour transition period. As currently written, R8.1 and R8.2 are essentially unmeasurable.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

5. Requirement R12 — Do you think that implementation or testing operations for a minimum of two hours annually is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: Entergy agrees with and supports the SOCRG comments. The SOCSRG believes that R12 is more appropriate as a measure for R6 and the number of required hours to test the plan is immaterial to reliability

6. Requirement R13 — The SDT proposes that within 6 calendar months of having lost its primary control center or backup capability that an entity will have a plan in place for re-establishing backup capability. Is 6 calendar months appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: Entergy agrees with and supports the SOCRG comments. This requirement is construed as attempting to give an entity an automatic waiver from R1 through R12 of this standard, following a catastrophic loss of its primary or backup control center (BUCC) that is a force majeure event. As written, it does not accomplish that goal. For example, what about the scenario where a primary control center is uninhabitable for longer than 2 hours? Is that entity immediately non compliant for this standard for having no backup for its BUCC?

7. If you are aware of any regional variances that would be required as a result of this standard, or if you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement, please identify them here.

Yes

No

Comments:

8. If you have any other comments on the proposed standard that you haven't already provided in response to the questions above, please provide them here.

Yes

No

Comments: Entergy agrees with and supports the SOCRG comments. There are no measures for the above requirements - therefore it is difficult to evaluate the impacts of their applicability. For example, the definition of what starts the transition period and what ends the transition period to the backup control center should be included in the standard.

Regarding R11 - what is an "indefinite period of time" and what would be a reasonable measure?

Regarding R4 and R5 - Not all requirements are created equal - some real-time operating requirements are essential to be backed up.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

A general comment by the SOCSRG that this standard, taken as a whole, appears to include "how" language. Requirements should be limited to "what" is required. Much of what is included in this standard appears to be "good utility practice" and not reliability requirements and should be stripped from the standard.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Please use this form to submit comments on the 1st draft of the standards for Backup Facilities (Project 2006-04). Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "BF Standards" in the subject line. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Sam Ciccone	
Organization:	FirstEnergy Corp.	
Telephone:	(330) 252-6383	
E-mail:	sciccone@firstenergycorp.com	
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input checked="" type="checkbox"/> RFC	<input checked="" type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input checked="" type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background Information

The Backup Facilities Standard Drafting Team (SDT) is submitting these questions as part of its initial effort in revising EOP-008. Extensive revisions have been made to the existing standard. Many of these changes are a direct result of comments received from industry and from FERC Order 693.

The SDT is attempting to come up with practical limits as to which Transmission Operators (TOPs) need to be covered by this standard. This is to avoid placing undue burdens on small entities that would not have a deleterious effect on the reliability of the Interconnection. In that same vein, the SDT is allowing TOPs and BAs to provide needed backup functionality through third-party contract services. Again, this is an effort to reduce the burden on these entities without adversely impacting reliability.

The SDT has not included the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard. This position is in conflict with a directive in FERC Order 693. The SDT has discussed this issue at length and has been unable to come up with a reliability-based reason for centrally dispatched GOP inclusion. However, this position will need to be defended at FERC when this standard is filed. Along those lines, the SDT is working on a position paper outlining the reasons for this approach. A specific question has been included on this topic with a direct request for inputs from GOPs. In general, the SDT must provide an alternative approach that presents an equally effective and efficient solution to the one proposed in FERC Order 693. This could include items such as suggesting strengthening other standards, presenting business practices that may be followed now that would preclude the need for a backup control center, lesser cost alternatives, etc.

The SDT has also established timeframes for when backup capability must be available. These time frames are different for Reliability Coordinators (RCs) versus TOPs and BAs. Specific questions asking for feedback on these times have been included below. In addition, questions related to times involved for testing and re-establishment of primary/backup capability have been raised.

The Backup Facilities Standard Drafting Team would like to receive industry comments on this revised standard. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "BF Standards" by **March 7, 2008**.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

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

1. The SDT has attempted to limit the applicability provisions for Transmission Operators in this standard. Do you agree with this limitation? If not, please provide the reasons and alternatives.

Yes

No

Comments: We do not agree with the limitations proposed in the applicability. We see the following reliability issues with these limitations:

1. It leaves it to the TOP to determine if the standard applies to him. The burden of determining applicability to these requirements should be the responsibility of the auditor.

2. If a TOP incorrectly determines that he is not responsible to have plans for backup functionality, his neighbors in the BES control system may be in jeopardy.

3. If an entity is registered as a TOP, then every standard applies to him since his registration has already determined he has impact on the reliability of the Bulk Electric System.

2. The SDT has decided not to include the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard at this time. The SDT believes that there are other equally efficient and effective methods for the GOPs to continue to fulfill their role in preserving the reliability of the Interconnection following the loss of its control center. This position is contrary to a directive in FERC Order 693. The SDT will need to provide specific reasoning to FERC for adopting such an approach and is therefore, soliciting opinions from the industry. Do you agree with this approach? If not, please state the reasons and suggest an alternative. The SDT is particularly interested in receiving inputs from GOPs as to how they currently handle such a situation.

Yes

No

Comments: We do not agree with the exclusion of a GOP with a centrally dispatched control center from the applicable entities in this standard. GOPs with responsibility for many units play an important role in the reliable operation of the BES. These GOPs should have business continuity plans. The bottom line is this: If it is a control center, and it has impact on the BES, it must be responsible for providing a way to backup its control center.

We suggest adding the "Generator Operator" to the Applicability section of the standard, and adding "Generator Operator with centrally dispatched control centers" to requirements R1, R2, R5, and R7 through R13.

3. Requirement R6 — Do you think that the 2-hour transition time frame for Reliability Coordinators is appropriate? If not, please state the reasons and suggest an alternative.

Yes

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

No

Comments: We suggest allowing provisions if the transition time takes longer than 2 hours. Similar to the current requirement for transition time from EOP-008-0 Requirement R1.8, we suggest rewording R6 as follows: "Each Reliability Coordinator shall plan for a 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) that is less than two hours. Interim provisions must be included in the plan when extenuating circumstances cause the transition to take longer than two hours."

4. Requirement R7, R8.1, and R8.2 — Do you think the 2 to 6-hour time frame for applicable Transmission Operators and Balancing Authorities is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: We do not agree with the "6-hour" time frame. Also, we suggest allowing provisions if the transition time takes longer than 2 hours. Similar to the current requirement for transition time from EOP-008-0 Requirement R1.8, we suggest rewording R7 and R8 as follows [rewording also includes GOP with centralized dispatched control center based on our comments from Question #2]:

R7: "Each Balancing Authority, Transmission Operator, and Generator Operator with a centrally dispatched control center shall plan for a 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) that is no more than one hour. Interim provisions must be included if it is less than two hours. Interim provisions must be included in the plan when extenuating circumstances cause the transition to take longer than two hours."

For R8, we suggest rewording as follows: "For each Reliability Coordinator, Balancing Authority, Transmission Operator, and Generator Operator with a centrally dispatched control center, the Operating Plan for backup functionality shall include a list of all entities that need to be notified of a change in operating locations."

R8.1 & R8.2 - We believe that these requirements are not necessary. Requirement R1.5 already includes requirements for the transition period while backup functionality is obtained. We suggest removing these requirements.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

5. Requirement R12 — Do you think that implementation or testing operations for a minimum of two hours annually is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: We agree with testing is very important. We also think that it is important enough that it should be performed more frequently and longer each time. We suggest a change from "two hours annually" to "four continuous hours semi-annually".

6. Requirement R13 — The SDT proposes that within 6 calendar months of having lost its primary control center or backup capability that an entity will have a plan in place for re-establishing backup capability. Is 6 calendar months appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

7. If you are aware of any regional variances that would be required as a result of this standard, or if you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement, please identify them here.

Yes

No

Comments:

8. If you have any other comments on the proposed standard that you haven't already provided in response to the questions above, please provide them here.

Yes

No

Comments:

1. Operating Plan, Operating Process, Operating Procedure - Some entities may use a combination of these documents or simply specific procedures or "steps" to ensure reliable backup functionality. The specific use of a Plan, Procedure, or Process may put additional burden on an entity to maintain additional and unnecessary documentation. Also, the use of all these terms make the wording awkward and degrade the readability of the standard. Therefore we suggest that anywhere an Operating Plan, Process or Procedure is required in this standard, that it simply states either a "plan" (note: small caps] or "steps required" that an entity be required to adhere to.

If the SDT is bound to the use of the capitalized NERC terms, then, for flexibility, we suggest that anywhere an Operating Plan is required, that entities be allowed to provide an Operating Process or Operating Procedure as an alternative. Also, we suggest that anywhere an Operating Process is required, that an entity be allowed to provide an Operating Procedure as an alternative. We suggest an across the standard change from:

a. "Operating Plan" to "Operating Plan, Operating Process, or Operating Procedure". [As an example of a precedent to using all three terms, see standard IRO-014-1 Requirement 1]

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

b: "Operating Process" to "Operating Process or Operating Procedure"

2. R1.2 - Suggest removing the phrase "high level" which is subjective. Providing simply an "overview" of the elements is a sufficient description.

3. R1.4.1 - This requirement is very confusing as written. To the point of the use of the terms Operating Plan, Process, and Procedure from our comment #1 above, this requirement needs to be simplified. We suggest rewording to simply: "Criteria for evacuation of the primary control center including the decision authority for initiating the plan or steps required for backup functionality."

4. R1.4.2 - Suggest removing the term "support". The goal of this requirement is to return to full operations, not just operations support.

5. R1.5 - The need to return back to the primary control center is missing from this requirement. Suggest adding the following at the end of this requirement: "as well as the actions to be taken to return back to primary control center functionality."

6. R1.6 - As written, this requirement could be too strict and not allow for personnel flexibility. Suggest rewording the requirement as follows: "Identification of the required roles of involved personnel during the initiation and implementation of the plan or steps required for backup functionality and for the return to the primary control center."

7. R2 - This requirement could be confusing as written and additionally seems to be missing important information regarding the operating and monitoring of the system during the transitional period. Suggest rewording this requirement as follows: "Each Reliability Coordinator, Balancing Authority, Transmission Operator and Generator Operator with a centrally dispatched control center shall have a copy of its plan or steps required for backup functionality located in its primary control center and at the location fulfilling backup functionality, and any facility used for operating or monitoring the BES during the transition process."

8. R3 - We believe that this requirement is duplicative of Requirement R1. The applicability and any delegation of TOP tasks would already be covered by R1. Therefore we suggest removing Requirement R3.

9. R4 - Standards must be followed and adhered to at all times. Therefore the last phrase of this requirement: "... as required for maintaining compliance with all Reliability Standards applicable to the Reliability Coordinator" is unnecessary and should be removed.

10. R5 - Standards must be followed and adhered to at all times. Therefore the last phrase of this requirement: "... sufficient for maintaining compliance with all Reliability Standards applicable to a Balancing Authority and Transmission Operator respectively" is unnecessary and should be removed.

11. R9 - To be consistent with other reliability standards, and to allow the entity flexibility in defining roles of authority over Operating Plans, Processes, and Procedures, we suggest removing the last phrase "... by a manager"

12. R9.1 - Since backup functionality includes more elements than just "location, capabilities, and communication protocols", we suggest simplifying this requirement and simply ending the sentence after "... of any changes."

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

13. R10 - The phrase "any aspect of" should be removed from this requirement. It is not clear what this means and not necessary.

14. R11 - We believe this requirement could be worded better as follows: Each Reliability Coordinator, Balancing Authority, Transmission Operator and Generator Operator with a centrally dispatched control center shall have backup capability to operate for an indefinite period of time."

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Please use this form to submit comments on the 1st draft of the standards for Backup Facilities (Project 2006-04). Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "BF Standards" in the subject line. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	MArk L Bennett
Organization:	Gainesville Regional Utilities
Telephone:	352-393-6418
E-mail:	bennettml@gru.com
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 — Transmission Owners
<input checked="" type="checkbox"/> FRCC	<input type="checkbox"/> 2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/> 3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/> 4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input checked="" type="checkbox"/> 5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/> 6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/> 7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/> 8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input checked="" type="checkbox"/> 9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/> 10 — Regional Reliability Organizations and Regional Entities

Background Information

The Backup Facilities Standard Drafting Team (SDT) is submitting these questions as part of its initial effort in revising EOP-008. Extensive revisions have been made to the existing standard. Many of these changes are a direct result of comments received from industry and from FERC Order 693.

The SDT is attempting to come up with practical limits as to which Transmission Operators (TOPs) need to be covered by this standard. This is to avoid placing undue burdens on small entities that would not have a deleterious effect on the reliability of the Interconnection. In that same vein, the SDT is allowing TOPs and BAs to provide needed backup functionality through third-party contract services. Again, this is an effort to reduce the burden on these entities without adversely impacting reliability.

The SDT has not included the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard. This position is in conflict with a directive in FERC Order 693. The SDT has discussed this issue at length and has been unable to come up with a reliability-based reason for centrally dispatched GOP inclusion. However, this position will need to be defended at FERC when this standard is filed. Along those lines, the SDT is working on a position paper outlining the reasons for this approach. A specific question has been included on this topic with a direct request for inputs from GOPs. In general, the SDT must provide an alternative approach that presents an equally effective and efficient solution to the one proposed in FERC Order 693. This could include items such as suggesting strengthening other standards, presenting business practices that may be followed now that would preclude the need for a backup control center, lesser cost alternatives, etc.

The SDT has also established timeframes for when backup capability must be available. These time frames are different for Reliability Coordinators (RCs) versus TOPs and BAs. Specific questions asking for feedback on these times have been included below. In addition, questions related to times involved for testing and re-establishment of primary/backup capability have been raised.

The Backup Facilities Standard Drafting Team would like to receive industry comments on this revised standard. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "BF Standards" by **March 7, 2008**.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

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

1. The SDT has attempted to limit the applicability provisions for Transmission Operators in this standard. Do you agree with this limitation? If not, please provide the reasons and alternatives.

Yes

No

Comments: In some cases an entity categorized as a transmission operator may be an entity that has a radial transmission line through their system and there is no need for either a control center or a back up. They still need a back up plan.

2. The SDT has decided not to include the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard at this time. The SDT believes that there are other equally efficient and effective methods for the GOPs to continue to fulfill their role in preserving the reliability of the Interconnection following the loss of its control center. This position is contrary to a directive in FERC Order 693. The SDT will need to provide specific reasoning to FERC for adopting such an approach and is therefore, soliciting opinions from the industry. Do you agree with this approach? If not, please state the reasons and suggest an alternative. The SDT is particularly interested in receiving inputs from GOPs as to how they currently handle such a situation.

Yes

No

Comments:

3. Requirement R6 — Do you think that the 2-hour transition time frame for Reliability Coordinators is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

4. Requirement R7, R8.1, and R8.2 — Do you think the 2 to 6-hour time frame for applicable Transmission Operators and Balancing Authorities is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

5. Requirement R12 — Do you think that implementation or testing operations for a minimum of two hours annually is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: I do believe that the BU facility, (If one has been established) should be tested annually by the operations personnel once a year. Not necessarily 2 hours a year.

6. Requirement R13 — The SDT proposes that within 6 calendar months of having lost its primary control center or backup capability that an entity will have a plan in place for re-establishing backup capability. Is 6 calendar months appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: I believe this needs to be removed. because in the case of a primary facility being lost, everyone in the region including NERC and FERC will know the primary facility is lost. Remove requirement. Within 6 months a back up plan has been utilized during the time period.

7. If you are aware of any regional variances that would be required as a result of this standard, or if you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement, please identify them here.

Yes

No

Comments:

8. If you have any other comments on the proposed standard that you haven't already provided in response to the questions above, please provide them here.

Yes

No

Comments: R1.4.1 This does not need to be addressed, Any Operational entity in NERC can recognize a reason to abandon their primary Control Center. (Fire, Avalanche, Forest fire, Flood, Tornado, No building, No Computer, GLeaking Gas, etc.) I believe this is not necessary at all R1.4.2 Same reason, when all in normal, we return to the primary facility. R.2 What is the reason to have the Operating plan at both places. Each operator has theoretically been trained yearly on the plan and should have an understanding of what is required. What more is needed? The entire SAR needs to be addressed. What is required is a plan to continue operation in the case of a primary Control Center, How it is accomplished seems up for more discussion as to what may be required for continued operation. This SAR as others seem to view all entities that have decided to have a back up center rather than a plan meet requirements that are not necessarily needed.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Please use this form to submit comments on the 1st draft of the standards for Backup Facilities (Project 2006-04). Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "BF Standards" in the subject line. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Alessia Dawes	
Organization:	Hydro One Networks	
Telephone:	416-345-5286	
E-mail:	alessia.dawes@hydroone.com	
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background Information

The Backup Facilities Standard Drafting Team (SDT) is submitting these questions as part of its initial effort in revising EOP-008. Extensive revisions have been made to the existing standard. Many of these changes are a direct result of comments received from industry and from FERC Order 693.

The SDT is attempting to come up with practical limits as to which Transmission Operators (TOPs) need to be covered by this standard. This is to avoid placing undue burdens on small entities that would not have a deleterious effect on the reliability of the Interconnection. In that same vein, the SDT is allowing TOPs and BAs to provide needed backup functionality through third-party contract services. Again, this is an effort to reduce the burden on these entities without adversely impacting reliability.

The SDT has not included the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard. This position is in conflict with a directive in FERC Order 693. The SDT has discussed this issue at length and has been unable to come up with a reliability-based reason for centrally dispatched GOP inclusion. However, this position will need to be defended at FERC when this standard is filed. Along those lines, the SDT is working on a position paper outlining the reasons for this approach. A specific question has been included on this topic with a direct request for inputs from GOPs. In general, the SDT must provide an alternative approach that presents an equally effective and efficient solution to the one proposed in FERC Order 693. This could include items such as suggesting strengthening other standards, presenting business practices that may be followed now that would preclude the need for a backup control center, lesser cost alternatives, etc.

The SDT has also established timeframes for when backup capability must be available. These time frames are different for Reliability Coordinators (RCs) versus TOPs and BAs. Specific questions asking for feedback on these times have been included below. In addition, questions related to times involved for testing and re-establishment of primary/backup capability have been raised.

The Backup Facilities Standard Drafting Team would like to receive industry comments on this revised standard. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "BF Standards" by **March 7, 2008**.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

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

1. The SDT has attempted to limit the applicability provisions for Transmission Operators in this standard. Do you agree with this limitation? If not, please provide the reasons and alternatives.

Yes

No

Comments:

2. The SDT has decided not to include the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard at this time. The SDT believes that there are other equally efficient and effective methods for the GOPs to continue to fulfill their role in preserving the reliability of the Interconnection following the loss of its control center. This position is contrary to a directive in FERC Order 693. The SDT will need to provide specific reasoning to FERC for adopting such an approach and is therefore, soliciting opinions from the industry. Do you agree with this approach? If not, please state the reasons and suggest an alternative. The SDT is particularly interested in receiving inputs from GOPs as to how they currently handle such a situation.

Yes

No

Comments: We agree, assuming that for each Generation Station (GS), a GOP normally dispatches using a central control centre and a local control centre is located at the GS.

3. Requirement R6 — Do you think that the 2-hour transition time frame for Reliability Coordinators is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

4. Requirement R7, R8.1, and R8.2 — Do you think the 2 to 6-hour time frame for applicable Transmission Operators and Balancing Authorities is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: The timeframe for the TOP should depend on whether its RC has the capability to be in "operational control" within 2 hours. There is no point in the RC be up and running within the 2 hours frame if they cannot control the system (e.g. switch, breakers). If the TOP is the only entity with "operational control" of Critical Assets or IROLs, then they must also be required to be up and running in the same timeframe as the RC.

Requirement R8.1. touches on this concept however, we suggest the words are changed to provide for more clarity.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

5. Requirement R12 — Do you think that implementation or testing operations for a minimum of two hours annually is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: Yes: 2 hours annually is appropriate. However please clarify if this requirement should read, "minimum of two CONTINUOUS hours, annually."

Also, is there consideration in the variance of testing the Operating Plan with respect to weather conditions (e.g. summer conditions vs. winter conditions)? In some locations, weather conditions may have a significant impact on staff transportation time.

6. Requirement R13 — The SDT proposes that within 6 calendar months of having lost its primary control center or backup capability that an entity will have a plan in place for re-establishing backup capability. Is 6 calendar months appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: 6 months is too long. We recommend 3-4 months.

As well, please re-word the requirement to provide clarification on whether the plan is needed after the fact (while operating from the back-up facility) or in the planning stages of the Operating Plan? We referring the use of the word "anticipate" in the requirement. The phrases "... anticipate total loss ... will last for more than six months..." and "... within six months of the date when the functionality is lost.." seem to be in conflict.

7. If you are aware of any regional variances that would be required as a result of this standard, or if you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement, please identify them here.

Yes

No

Comments:

8. If you have any other comments on the proposed standard that you haven't already provided in response to the questions above, please provide them here.

Yes

No

Comments: Requirement R9 states that the Plan must be approved by a manager. Manager of what? This level of approval for such an important plan is too low. We suggest VP or higher. For review, we suggest an applicable "Operating/Control Room Manager".

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Please use this form to submit comments on the 1st draft of the standards for Backup Facilities (Project 2006-04). Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "BF Standards" in the subject line. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

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

Background Information

The Backup Facilities Standard Drafting Team (SDT) is submitting these questions as part of its initial effort in revising EOP-008. Extensive revisions have been made to the existing standard. Many of these changes are a direct result of comments received from industry and from FERC Order 693.

The SDT is attempting to come up with practical limits as to which Transmission Operators (TOPs) need to be covered by this standard. This is to avoid placing undue burdens on small entities that would not have a deleterious effect on the reliability of the Interconnection. In that same vein, the SDT is allowing TOPs and BAs to provide needed backup functionality through third-party contract services. Again, this is an effort to reduce the burden on these entities without adversely impacting reliability.

The SDT has not included the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard. This position is in conflict with a directive in FERC Order 693. The SDT has discussed this issue at length and has been unable to come up with a reliability-based reason for centrally dispatched GOP inclusion. However, this position will need to be defended at FERC when this standard is filed. Along those lines, the SDT is working on a position paper outlining the reasons for this approach. A specific question has been included on this topic with a direct request for inputs from GOPs. In general, the SDT must provide an alternative approach that presents an equally effective and efficient solution to the one proposed in FERC Order 693. This could include items such as suggesting strengthening other standards, presenting business practices that may be followed now that would preclude the need for a backup control center, lesser cost alternatives, etc.

The SDT has also established timeframes for when backup capability must be available. These time frames are different for Reliability Coordinators (RCs) versus TOPs and BAs. Specific questions asking for feedback on these times have been included below. In addition, questions related to times involved for testing and re-establishment of primary/backup capability have been raised.

The Backup Facilities Standard Drafting Team would like to receive industry comments on this revised standard. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "BF Standards" by **March 7, 2008**.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

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

1. The SDT has attempted to limit the applicability provisions for Transmission Operators in this standard. Do you agree with this limitation? If not, please provide the reasons and alternatives.

Yes

No

Comments: This standard should apply to all RCs, BAs, and TOPs. If an entity is registered as a TOP, their transmission system is part of the BES.

The intent of providing backup facilities is to ensure the BES continues to be controlled and monitored.

2. The SDT has decided not to include the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard at this time. The SDT believes that there are other equally efficient and effective methods for the GOPs to continue to fulfill their role in preserving the reliability of the Interconnection following the loss of its control center. This position is contrary to a directive in FERC Order 693. The SDT will need to provide specific reasoning to FERC for adopting such an approach and is therefore, soliciting opinions from the industry. Do you agree with this approach? If not, please state the reasons and suggest an alternative. The SDT is particularly interested in receiving inputs from GOPs as to how they currently handle such a situation.

Yes

No

Comments: The applicability of this standard should be restricted to RC, BA, and TOP functions. The GOP's functions is to follow the directions of the BA for demand-energy balance and to ensure that applicable standards are complied to. It is essential that the BA, TOP, and RC have back-up facilities or provisions as specified in this standard but the GOP need not be included as long as the BA ensures that all BA functions are addressed by its back-up facilities.

However, it is important that GOPs have a backup communication plan in place which must be provided to the appropriate reliability entity upon request.

3. Requirement R6 — Do you think that the 2-hour transition time frame for Reliability Coordinators is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

R6 needs additional "sub-bullet" to address what happens if the two hour time limit on the RC implementation of the backup plan is exceeded, similar to R8.1.

It is not the transition time that is in focus here but the system reliability issues which could come up during the transition period which needs to be looked at closely.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

4. Requirement R7, R8.1, and R8.2 — Do you think the 2 to 6-hour time frame for applicable Transmission Operators and Balancing Authorities is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: HQT believe that bullets 8.1 and 8.2 are not related to requirement 8, perhaps these should be relocated to requirement 7.

The SDT should clarify why the RC has a maximum delay of 2 hour with no leeway for longer time while the TOP and BA have a maximum delay of 6 hour with a process to have situational awareness if the delay is planned to be greater than 2 hour. HQT believe that the three entities should have the same time delay and leeway time. See our answer to Q3

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

5. Requirement R12 — Do you think that implementation or testing operations for a minimum of two hours annually is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: It is a minimum

6. Requirement R13 — The SDT proposes that within 6 calendar months of having lost its primary control center or backup capability that an entity will have a plan in place for re-establishing backup capability. Is 6 calendar months appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: HQT suggest the drafting team to provide for a compliance exemption should the primary or back up control center be lost because of a catastrophic failure.

7. If you are aware of any regional variances that would be required as a result of this standard, or if you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement, please identify them here.

Yes

No

Comments:

8. If you have any other comments on the proposed standard that you haven't already provided in response to the questions above, please provide them here.

Yes

No

Comments:

Drafting team should clarify the term "GOP centrally dispatched".

The Drafting Team should focus on the reliability objective as opposed to how the objective is met.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Please use this form to submit comments on the 1st draft of the standards for Backup Facilities (Project 2006-04). Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "BF Standards" in the subject line. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

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

Background Information

The Backup Facilities Standard Drafting Team (SDT) is submitting these questions as part of its initial effort in revising EOP-008. Extensive revisions have been made to the existing standard. Many of these changes are a direct result of comments received from industry and from FERC Order 693.

The SDT is attempting to come up with practical limits as to which Transmission Operators (TOPs) need to be covered by this standard. This is to avoid placing undue burdens on small entities that would not have a deleterious effect on the reliability of the Interconnection. In that same vein, the SDT is allowing TOPs and BAs to provide needed backup functionality through third-party contract services. Again, this is an effort to reduce the burden on these entities without adversely impacting reliability.

The SDT has not included the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard. This position is in conflict with a directive in FERC Order 693. The SDT has discussed this issue at length and has been unable to come up with a reliability-based reason for centrally dispatched GOP inclusion. However, this position will need to be defended at FERC when this standard is filed. Along those lines, the SDT is working on a position paper outlining the reasons for this approach. A specific question has been included on this topic with a direct request for inputs from GOPs. In general, the SDT must provide an alternative approach that presents an equally effective and efficient solution to the one proposed in FERC Order 693. This could include items such as suggesting strengthening other standards, presenting business practices that may be followed now that would preclude the need for a backup control center, lesser cost alternatives, etc.

The SDT has also established timeframes for when backup capability must be available. These time frames are different for Reliability Coordinators (RCs) versus TOPs and BAs. Specific questions asking for feedback on these times have been included below. In addition, questions related to times involved for testing and re-establishment of primary/backup capability have been raised.

The Backup Facilities Standard Drafting Team would like to receive industry comments on this revised standard. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "BF Standards" by **March 7, 2008**.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

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

1. The SDT has attempted to limit the applicability provisions for Transmission Operators in this standard. Do you agree with this limitation? If not, please provide the reasons and alternatives.

Yes

No

Comments: This standard should apply to all RCs, BAs, and TOPs as the requirements so stipulate. We are therefore unclear on the basis of this question.

The intent of providing backup capability/facilities is to ensure the BES continues to be controlled and monitored to balance load-generation-interchange, maintain frequency within acceptable range and loading on transmission network within SOLs and IROLs. BA, TOP and RC are the operating entities that are responsible for these tasks and hence must provide backup facilities to ensure continued control and operation.

However, if the question is to address the specific provision in the Applicability Section, viz: "Transmission Operator with control of Facilities that are designated as Critical Assets or with defined Interconnection Reliability Operating Limits (IROLs).", then our comment would be that the provision should stop at "Critical Assets" since R1.2 in CIP-002-1 clearly stipulates that Critical Assets are those needed to support the reliable operation of the BES, which generally includes monitoring and operating to within IROLs and SOLs. Tying the provision to "with defined IROLs" would allow TOPs that monitors and control SOLs, and deploy/operate BES facilities that could affect BES reliability to be excluded from this standard, which in our view is unacceptable since SOL could become IROL any time as system conditions change.

2. The SDT has decided not to include the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard at this time. The SDT believes that there are other equally efficient and effective methods for the GOPs to continue to fulfill their role in preserving the reliability of the Interconnection following the loss of its control center. This position is contrary to a directive in FERC Order 693. The SDT will need to provide specific reasoning to FERC for adopting such an approach and is therefore, soliciting opinions from the industry. Do you agree with this approach? If not, please state the reasons and suggest an alternative. The SDT is particularly interested in receiving inputs from GOPs as to how they currently handle such a situation.

Yes

No

Comments: We agree that there are other equally effective and efficient methods for the GOPs to continue to fulfill their obligation to generate, may it be for commercial reasons or reliability reasons.

Generally speaking, the GOPs follow instructions of the BA, who is responsible for generation-load-interchange balance and maintaining system frequency. We agree that the standard does not need to include GOPs but the reasoning is that the BA will ensure dispatch instruction is provided to the GOPs to meet reliability standards. We recognize that some GOPs elect to set up control centres to operate a group of generators but this

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

is a process set up for business efficiency only. Loss of a GOP operating centre does not hamper the capability of a BA communicating dispatch instructions directly to the generator/generating plant for continuous operation.

However, it is important that GOPs have a backup communications plan in place which must be provided to the appropriate reliability entity upon request.

3. Requirement R6 — Do you think that the 2-hour transition time frame for Reliability Coordinators is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: The existing requirement R1.8 stipulates that the responsible entity shall have interim provisions if the implementation of the back-up capability plan will take longer than one hour. This draft standard appears to be relaxing this requirement by changing it to two hours. What is the basis for this change?

We can continue to support the 1 hour requirement. However, if a time frame is to be removed, we recommend that the requirement be written such that the responsible entity shall provide operational capability at all times to ensure continuous operation, monitoring and control of the BES. In this case, it will be up to the responsible entity to demonstrate how its operation and control will continue during the transition period, such as by arranging other entities to take over operation and control during that period.

4. Requirement R7, R8.1, and R8.2 — Do you think the 2 to 6-hour time frame for applicable Transmission Operators and Balancing Authorities is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: We do not understand the rationale behind the difference in the 2-hour time frame for the RC and the 6-hour time frame for the BA/TOP. Mosts RCs rely on the BAs and TOPs to implement actions to ensure reliable operation of its RC area. They will be helpless to have directives implemented if the TOP or BA does not have a functioning control center or alternate plan to perform actions such as switching in the field or dispatch at the plant to meet its 2 hour. Thus, a six hour outage of a BA could in effect be equivalent to a six-hour outage of the RC. These times should match what is ultimately decided for the RC.

Additionally, we urge the SDT to consider our suggestion made in Q3 that: ". the requirement be written such that the responsible entity shall provide operational capability at all times to ensure continuous operation, monitoring and control of the BES.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

5. Requirement R12 — Do you think that implementation or testing operations for a minimum of two hours annually is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: There should be a minimum amount of testing required. However, we don't see a justification for two hours. We ask the SDT to provide a justification for this important time frame. In the absence of a technical justification, we recommend a full testing of an entity's backup plan be completed regardless of the time required.

6. Requirement R13 — The SDT proposes that within 6 calendar months of having lost its primary control center or backup capability that an entity will have a plan in place for re-establishing backup capability. Is 6 calendar months appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: We do not see the need for this requirement. It implies that the responsible entity must establish a long-term or an N-2 contingency plan.

Losing a primary control capability/facility for a period longer than several days is a rare event, if it has ever occurred before. The need for a long-term plan seems unnecessary. If the backup capability is lost, then the responsible entity would fail its primary requirement of providing the backup capability, unless it immediately re-establish such a capability by securing new facilities or arranging backup by another entity. The need to provide a plan (within 6 months) if the backup capability is lost also seems unnecessary.

In essence, no time frame needs to be stipulated; just a requirement for the responsible entity to demonstrate the backup capability requirement can continue to be met if the loss of either the primary or backup capability/facility is assessed to be indefinite.

7. If you are aware of any regional variances that would be required as a result of this standard, or if you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement, please identify them here.

Yes

No

Comments: Provided that our suggestion in the second part of Q1 is adopted. Letting TOP to decide if this standard applies to them based on their own determination of their critical assets and/or IROs seems to be a self-regulation process, which violates the legislation establishing a requirement for the ERO.

8. If you have any other comments on the proposed standard that you haven't already provided in response to the questions above, please provide them here.

Yes

No

Comments:

R1 is written with the backup facility in mind. It needs revision if the backup plan is to a backup capability such as by transferring operational control to another operating entity.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

R2 - Addresses that the RC, BA and TOP shall have a copy of its operating plan to be physically located at both, the primary control facility and the back-up control facility. It does not address the issue of exchanging this information between the applicable entities. It is essential that the RC is aware of the TOP and BA's operating plans and backup centers - something akin to the system restoration plan - not sure if the RC should review and approve the backup operating plans of the the TOP and BA, but as a minimum, the RC should be provided with the appropriate information by the applicable TOP and BA entities.

R3: It is unclear to us what this requirement aims to accomplish. If a responsible entity has to use other entities to implement its backup functionality, it will be explicitly included in its plan.

R4 should be modified to require each RC to have an arrangement for backup control facility or capability. This requirement will then be more succinct, as stringent, and provide the RC flexibility to make necessary business arrangements to provide backup capability. There is nothing especially important about the RC having its own backup control center or utilizing another RC's control center. It is possible that a third party might be willing to develop control capability to serve as a backup for multiple parties.

R5 is really redundant to R1. If a BA and TOP must have a plan to have backup functionality, they have met Requirement 5.

R9: We do not see the need to specify who in the responsible entity's organization should approve the plan (ref. approved by a manager). This is an internal business process that has nothing to do with reliability. If approval of a backup plan is required, then the responsible entities shall submit their plans to the RE for review and approval.

The version 2 SAR of the subject matter references transmission owners (TOs) with transmission control centers as an applicable entity to this standard. The current draft of the standard is silent on such the applicability of TOs - was the omission deliberate? If it was, we do not see any statement or logic to this effect.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Please use this form to submit comments on the 1st draft of the standards for Backup Facilities (Project 2006-04). Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "BF Standards" in the subject line. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

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

Background Information

The Backup Facilities Standard Drafting Team (SDT) is submitting these questions as part of its initial effort in revising EOP-008. Extensive revisions have been made to the existing standard. Many of these changes are a direct result of comments received from industry and from FERC Order 693.

The SDT is attempting to come up with practical limits as to which Transmission Operators (TOPs) need to be covered by this standard. This is to avoid placing undue burdens on small entities that would not have a deleterious effect on the reliability of the Interconnection. In that same vein, the SDT is allowing TOPs and BAs to provide needed backup functionality through third-party contract services. Again, this is an effort to reduce the burden on these entities without adversely impacting reliability.

The SDT has not included the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard. This position is in conflict with a directive in FERC Order 693. The SDT has discussed this issue at length and has been unable to come up with a reliability-based reason for centrally dispatched GOP inclusion. However, this position will need to be defended at FERC when this standard is filed. Along those lines, the SDT is working on a position paper outlining the reasons for this approach. A specific question has been included on this topic with a direct request for inputs from GOPs. In general, the SDT must provide an alternative approach that presents an equally effective and efficient solution to the one proposed in FERC Order 693. This could include items such as suggesting strengthening other standards, presenting business practices that may be followed now that would preclude the need for a backup control center, lesser cost alternatives, etc.

The SDT has also established timeframes for when backup capability must be available. These time frames are different for Reliability Coordinators (RCs) versus TOPs and BAs. Specific questions asking for feedback on these times have been included below. In addition, questions related to times involved for testing and re-establishment of primary/backup capability have been raised.

The Backup Facilities Standard Drafting Team would like to receive industry comments on this revised standard. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "BF Standards" by **March 7, 2008**.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

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

1. The SDT has attempted to limit the applicability provisions for Transmission Operators in this standard. Do you agree with this limitation? If not, please provide the reasons and alternatives.

Yes

No

Comments: This standard should apply to all RCs, BAs, and TOPs. If an entity is registered as a TOP, their transmission system is part of the BES. This is equivalent to letting a given TOP decide if a standard applies to them. Clearly, if they do not operate BES equipment, they should not be registered at all.

The intent of providing backup capabilities is to ensure the BES continues to be controlled and monitored to balance load-generation-interchange, maintain frequency within acceptable range and loading on transmission network within SOLs and IROLs. All TOPs are the operating entities that are responsible for some of these tasks and hence must provide backup capabilities to ensure continued control and operation.

2. The SDT has decided not to include the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard at this time. The SDT believes that there are other equally efficient and effective methods for the GOPs to continue to fulfill their role in preserving the reliability of the Interconnection following the loss of its control center. This position is contrary to a directive in FERC Order 693. The SDT will need to provide specific reasoning to FERC for adopting such an approach and is therefore, soliciting opinions from the industry. Do you agree with this approach? If not, please state the reasons and suggest an alternative. The SDT is particularly interested in receiving inputs from GOPs as to how they currently handle such a situation.

Yes

No

Comments: The applicability of this standard should be restricted to RC, BA, and TOP functions. The GOP's functions is to follow the directions of the BA for demand-energy balance, follow diections from the TOP with respect to voltage control, and to ensure that applicable standards are complied to. It is essential that the BA, TOP, and RC have back-up facilities or provisions as specified in this standard but the GOP need not be included as long as the BA ensures that all BA functions are addressed by its back-up plans.

However, it is important that GOPs have backup communications in place for failure of their primary communications path. But, this would likely be in a COM Standard.

3. Requirement R6 — Do you think that the 2-hour transition time frame for Reliability Coordinators is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

R6 needs additional "sub-bullet" to address what happens if the two hour time limit on the RC implementation of the backup plan is exceeded, similar to R8.1.

It is not the transition time that is in focus here but the system reliability issues which could come up during the transition period which needs to be looked at closely.

4. Requirement R7, R8.1, and R8.2 — Do you think the 2 to 6-hour time frame for applicable Transmission Operators and Balancing Authorities is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: Bullets 8.1 and 8.2 appear to be related to requirement 7, not 8.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

5. Requirement R12 — Do you think that implementation or testing operations for a minimum of two hours annually is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: It is a minimum

6. Requirement R13 — The SDT proposes that within 6 calendar months of having lost its primary control center or backup capability that an entity will have a plan in place for re-establishing backup capability. Is 6 calendar months appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: This requirement is trying to anticipate every conceivable situation that could occur. Standards should not be written to anticipate all possible situations. In reality, this is a business continuity issue and does not belong in the standard. Most professionals with business continuity responsibilities believe that the risk of losing your main control center for such an extended period is extremely low. Most likely an entity will only have to implement their back-up capability plan for a short period of time and will be able to re-occupy their main control center. Additionally, there are simply too many variables involved in establishing new backup capability for an extended period of time. The ERO and REs should work closely with the affected entity to develop a plan to restore backup capability to address this unlikely situation.

7. If you are aware of any regional variances that would be required as a result of this standard, or if you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement, please identify them here.

Yes

No

Comments:

8. If you have any other comments on the proposed standard that you haven't already provided in response to the questions above, please provide them here.

Yes

No

Comments:

The Drafting Team should focus on the reliability objective as opposed to how the objective is met.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Please use this form to submit comments on the 1st draft of the standards for Backup Facilities (Project 2006-04). Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "BF Standards" in the subject line. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

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

Background Information

The Backup Facilities Standard Drafting Team (SDT) is submitting these questions as part of its initial effort in revising EOP-008. Extensive revisions have been made to the existing standard. Many of these changes are a direct result of comments received from industry and from FERC Order 693.

The SDT is attempting to come up with practical limits as to which Transmission Operators (TOPs) need to be covered by this standard. This is to avoid placing undue burdens on small entities that would not have a deleterious effect on the reliability of the Interconnection. In that same vein, the SDT is allowing TOPs and BAs to provide needed backup functionality through third-party contract services. Again, this is an effort to reduce the burden on these entities without adversely impacting reliability.

The SDT has not included the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard. This position is in conflict with a directive in FERC Order 693. The SDT has discussed this issue at length and has been unable to come up with a reliability-based reason for centrally dispatched GOP inclusion. However, this position will need to be defended at FERC when this standard is filed. Along those lines, the SDT is working on a position paper outlining the reasons for this approach. A specific question has been included on this topic with a direct request for inputs from GOPs. In general, the SDT must provide an alternative approach that presents an equally effective and efficient solution to the one proposed in FERC Order 693. This could include items such as suggesting strengthening other standards, presenting business practices that may be followed now that would preclude the need for a backup control center, lesser cost alternatives, etc.

The SDT has also established timeframes for when backup capability must be available. These time frames are different for Reliability Coordinators (RCs) versus TOPs and BAs. Specific questions asking for feedback on these times have been included below. In addition, questions related to times involved for testing and re-establishment of primary/backup capability have been raised.

The Backup Facilities Standard Drafting Team would like to receive industry comments on this revised standard. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "BF Standards" by **March 7, 2008**.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

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

1. The SDT has attempted to limit the applicability provisions for Transmission Operators in this standard. Do you agree with this limitation? If not, please provide the reasons and alternatives.

Yes

No

Comments: This standard should apply to all RCs, BAs, and TOPs. If an entity is registered as a TOP, their transmission system is part of the BES. Any part of the BES could become limited by an IROL under certain conditions. Furthermore, TOPs are responsible for identifying their own Critical Assets and IROLs. Thus, this is equivalent to letting a given TOP decide if a standard applies to them. Letting a responsible entity determine if a standard applies to them is a form of self-regulation.

The intent of providing backup capabilities is to ensure the BES continues to be controlled and monitored to balance load-generation-interchange, maintain frequency within acceptable range and loading on transmission network within SOLs and IROLs. All TOPs are the operating entities that are responsible for some of these tasks and hence must provide backup capabilities to ensure continued control and operation.

2. The SDT has decided not to include the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard at this time. The SDT believes that there are other equally efficient and effective methods for the GOPs to continue to fulfill their role in preserving the reliability of the Interconnection following the loss of its control center. This position is contrary to a directive in FERC Order 693. The SDT will need to provide specific reasoning to FERC for adopting such an approach and is therefore, soliciting opinions from the industry. Do you agree with this approach? If not, please state the reasons and suggest an alternative. The SDT is particularly interested in receiving inputs from GOPs as to how they currently handle such a situation.

Yes

No

Comments:

3. Requirement R6 — Do you think that the 2-hour transition time frame for Reliability Coordinators is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: The regulatory approved reliability standard currently requires that a responsible entity have interim provisions if the implementation of the back-up capability plan will take longer than one hour. This draft standard appears to be reducing the stringency of this requirement by changing it to two hours. What is the justification for this? Are there responsible entities experiencing difficulties meeting the requirement? If all responsible entities are currently compliant with the requirement, why increase the time frame?

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

In fact, we recommend that time frame should not be considered. The entity should be responsible for meeting a core set of requirements at all times.

4. Requirement R7, R8.1, and R8.2 — Do you think the 2 to 6-hour time frame for applicable Transmission Operators and Balancing Authorities is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: Mosts RCs only have functional control of the transmission system. They will be helpless to have directives implemented if the TOP or BA does not have a functioning control center or alternate plan to perform actions such as switching in the field or dispatch at the plant. Thus, a six hour outage of a BA could in effect be equivalent to a six-hour outage of the RC. These times should match what is ultimately decided for the RC.

In fact, we recommend an alternative approach to a time limit in question 3. We repeat that here and suggest it for application to the TOP and BA as well.

In fact, we recommend that time frame should not be considered. The entity should be responsible for meeting a core set of requirements at all times.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

5. Requirement R12 — Do you think that implementation or testing operations for a minimum of two hours annually is appropriate? If not, please state the reasons and suggest an alternative.

- Yes
 No

Comments: There should be a minimum amount of testing required. However, we don't see a justification for two hours. Why not one or three? The SDT should establish a justification for this important time frame. It should not be arbitrary or based on judgment. A full test of an entity's test plan should be completed regardless of the time required.

6. Requirement R13 — The SDT proposes that within 6 calendar months of having lost its primary control center or backup capability that an entity will have a plan in place for re-establishing backup capability. Is 6 calendar months appropriate? If not, please state the reasons and suggest an alternative.

- Yes
 No

Comments: This requirement is trying to anticipate every conceivable situation that could occur. Standards should not be written to anticipate all possible situations. In reality, this is a business continuity issue and does not belong in the standard. Most professionals with business continuity responsibilities believe that the risk of losing your main control center for such an extended period is extremely low. Most likely an entity will only have to implement their back-up capability plan for a short period of time and will be able to re-occupy their main control center. Additionally, there are simply too many variables involved in establishing new backup capability for an extended period of time. The ERO and REs should work closely with the affected entity to develop a plan to restore backup capability to address this unlikely situation.

7. If you are aware of any regional variances that would be required as a result of this standard, or if you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement, please identify them here.

- Yes
 No

Comments: Allowing a BA or TOP to in effect determine if the standard applies to them because they determine their critical assets and/or IROs is equivalent to self-regulation which is clearly a violation of the legislation establishing a requirement for the ERO.

8. If you have any other comments on the proposed standard that you haven't already provided in response to the questions above, please provide them here.

- Yes
 No

Comments: In general, this requirement is overly detailed and broad. There are really only three basic requirements for establishing backup operational capability. Those three requirements are:

1. Have a plan
2. Test plan

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

3. Implement when needed.

Any requirements beyond these three basic requirements will only detract from reliability because they will cause entities to focus on requirements outside of these basics.

Many of the subrequirements in this standard are not requirements at all. Rather they are criteria or lead-in statements for other subrequirements. This is problematic because the FERC has established VRFs for subrequirements in the past that are really not requirements and is now requiring the establishment of VSLs for many subrequirements that are not requirements at all or may even be explanatory text. This draft standard is perpetuating this problem.

Any subrequirements that are criteria should simply be listed as bullets under the requirement with the requirement specifying that it is subject to the following criteria. For instance, all subrequirements under R1 do not really have any requirement. They are simply a list of what should be included in the plan identified in R1 or explanatory text. Thus, many of these sub-requirements should simply become bullets. This would also aid in the establishment of multiple VSLs because an entity that has a plan but is only missing couple of the requirements might have a low VSL. Whereas an entity, not having a plan would then fall into the SEVERE VSL.

R1.1 is not necessary but is simply a part of a plan. A plan doesn't exist if it doesn't identify where and how. This could be specified as a criterion for the plan.

R1.2 is unnecessary. First, high level is subjective. Requirements should not be subjective. Secondly, each of the sub-requirements under it will stand alone without R1.2.

R1.3 should be modified. What it really needs to state is that the backup functionality needs to have current BES data. It should not be tied to what the primary control center has because the primary control center data may be out of synch with the BES. This would be a reason to utilize the backup functionality.

R1.4 is not necessary. The subrequirements under it do an adequate job of spelling out the basic minimum requirements without the introductory statement that R1.4 is. A third criteria should be added that identifies who makes the decision to implement the back-up plan.

R2 is not necessary if there is going to be timing requirements for bringing the backup functionality. It is a good idea but should not be a requirement. In effect, requiring the backup functionality to be functioning in x amount of time will cause the responsible entity to have the plan at their fingertips. Additionally, a properly trained system operator should be able to implement the plan without referring to the plan.

R3 is a requirement that is an example of an attempt to write the standard for a every conceivable situation and is not necessary. If a responsible entity has to use other entities to implement its backup functionality, it will be explicitly included or they will not have a plan that they can test. Thus, they will not meet requirement.

R4 should be modified to require each RC to have arranged for the availability of back-up capability. This requirement will then be more succinct, as stringent, and provide the RC flexibility to make necessary business arrangements to provide back-up capability. There is nothing especially important about the RC owning its own backup control center or utilizing another RC's control center. It is possible that a third party that is not an RC might be willing to develop a control center to serve as a backup for multiple parties. As

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

long as the requirement functionality is provided, why would this be a problem? The requirement as written would preclude this satisfactory arrangement.

R5 is really redundant to R1. If a BA and TOP must have a plan to have backup functionality, they have met Requirement 5. Let's not create an opportunity for double jeopardy.

Requirement 8 and all of its subrequirements are not really requirements. It really is criteria for R1.

Requirement 9 should remove the requirement to have the plan approved by a manager. This is really a business process requirement and does nothing to ensure reliability. Besides, Requirement 13 will cause this to happen anyway. Do you really think that the plan can be tested annually without a manager's approval?

R10 and R11 is not really a requirement. It belongs as a criterion under R1.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Please use this form to submit comments on the 1st draft of the standards for Backup Facilities (Project 2006-04). Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "BF Standards" in the subject line. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Joseph DePoorter
Organization:	Madison Gas and Electric Company
Telephone:	608-252-1581
E-mail:	jdepooter@mge.com
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/> 2 — RTOs and ISOs
<input checked="" type="checkbox"/> MRO	<input type="checkbox"/> 3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input checked="" type="checkbox"/> 4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/> 5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/> 6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/> 7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/> 8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/> 9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/> 10 — Regional Reliability Organizations and Regional Entities

Background Information

The Backup Facilities Standard Drafting Team (SDT) is submitting these questions as part of its initial effort in revising EOP-008. Extensive revisions have been made to the existing standard. Many of these changes are a direct result of comments received from industry and from FERC Order 693.

The SDT is attempting to come up with practical limits as to which Transmission Operators (TOPs) need to be covered by this standard. This is to avoid placing undue burdens on small entities that would not have a deleterious effect on the reliability of the Interconnection. In that same vein, the SDT is allowing TOPs and BAs to provide needed backup functionality through third-party contract services. Again, this is an effort to reduce the burden on these entities without adversely impacting reliability.

The SDT has not included the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard. This position is in conflict with a directive in FERC Order 693. The SDT has discussed this issue at length and has been unable to come up with a reliability-based reason for centrally dispatched GOP inclusion. However, this position will need to be defended at FERC when this standard is filed. Along those lines, the SDT is working on a position paper outlining the reasons for this approach. A specific question has been included on this topic with a direct request for inputs from GOPs. In general, the SDT must provide an alternative approach that presents an equally effective and efficient solution to the one proposed in FERC Order 693. This could include items such as suggesting strengthening other standards, presenting business practices that may be followed now that would preclude the need for a backup control center, lesser cost alternatives, etc.

The SDT has also established timeframes for when backup capability must be available. These time frames are different for Reliability Coordinators (RCs) versus TOPs and BAs. Specific questions asking for feedback on these times have been included below. In addition, questions related to times involved for testing and re-establishment of primary/backup capability have been raised.

The Backup Facilities Standard Drafting Team would like to receive industry comments on this revised standard. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "BF Standards" by **March 7, 2008**.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

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

1. The SDT has attempted to limit the applicability provisions for Transmission Operators in this standard. Do you agree with this limitation? If not, please provide the reasons and alternatives.

Yes

No

Comments: This standard should apply to all RCs, BAs, and TOPs. Any loss of primary control center may have a huge effect on the BES. All TOPs should be required and if they believe they should not be, then the TOP should request a waiver from NERCie, if the TOP only had a small radio fed transmission system.

2. The SDT has decided not to include the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard at this time. The SDT believes that there are other equally efficient and effective methods for the GOPs to continue to fulfill their role in preserving the reliability of the Interconnection following the loss of its control center. This position is contrary to a directive in FERC Order 693. The SDT will need to provide specific reasoning to FERC for adopting such an approach and is therefore, soliciting opinions from the industry. Do you agree with this approach? If not, please state the reasons and suggest an alternative. The SDT is particularly interested in receiving inputs from GOPs as to how they currently handle such a situation.

Yes

No

Comments:

3. Requirement R6 — Do you think that the 2-hour transition time frame for Reliability Coordinators is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: A "less than two hour" window to fully implement the backup plan and get backup functionality up and running is and can be a great task. There should be a provision that if the backup plan can not be obtained within the two hour time frame.

4. Requirement R7, R8.1, and R8.2 — Do you think the 2 to 6-hour time frame for applicable Transmission Operators and Balancing Authorities is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: Since R8.1 and R8.2 break down R7, they should be renumbered as sub bullets to R7.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

5. Requirement R12 — Do you think that implementation or testing operations for a minimum of two hours annually is appropriate? If not, please state the reasons and suggest an alternative.

Yes
 No

Comments: There should be adequate testing of the backup facility. A two hour annual test could consist of four, 30 minute periods. R12 should be written that "... implementation or test operations to ensure the RC, TOP, BA's minimum requirements are met per R1". This would ensure that the Operating Plan was implemented and all sub bullets of R1 are tested or simulated. As a BA, we would want to see an entire hour (hour ending X to hour ending Y) of information. This would allow us to ensure that the Operating Plan of R1 is satisfied.

6. Requirement R13 — The SDT proposes that within 6 calendar months of having lost its primary control center or backup capability that an entity will have a plan in place for re-establishing backup capability. Is 6 calendar months appropriate? If not, please state the reasons and suggest an alternative.

Yes
 No

Comments: We do not "anticipate" the loss of our primary or backup capability. If a RC, TOP, or BA was without their primary control center for any length of time it would have an impact on their revenue generation and would place a burden on "whoever" was assisting them. I would think that the Regional Entity would be involved and the RC, TOP or BA would be working to get their primary control center up and running as soon as possible. FERC Order 693 does not state a 6 month time frame. R13 could state that the Regional Entity will be notified whenever the primary control center is non-functional except when the backup control center is being tested or training is taking place. The RE will have a plan fulfilling R1 requirements if the primary and backup facilities are non operable.

7. If you are aware of any regional variances that would be required as a result of this standard, or if you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement, please identify them here.

Yes
 No

Comments: R8.2 states that the Operating Procedure will ensure the calculation and control of ACE beyond the two hour time period. BAL-005-0, R6 states that if a BA is unable to calculate ACE for more than 30 minutes it shall notify its RC. Perhaps the wording of R8.2 should be the same as BAL-005-0, R6 so there is no confusion.

8. If you have any other comments on the proposed standard that you haven't already provided in response to the questions above, please provide them here.

Yes
 No

Comments: R5 should be broken down into sub bullets, ie: R5.1, monitoring, R5.2, Control, R5.3, Logging, ect.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

R9 The last three words should be deleted "by a manager". Some entities may not have "manager" in the title of the position that writes and implements the Operating Plan.

R10, the last sentence uses the words "any aspect" and needs to be removed. FERC Order 693, para 663 states "... and the provision of a minimum set of tools and facilities to replicate the critical reliability functions of the primary control center". The statement "any aspect" implies we can use nothing from the primary control center. What if I rely on security cameras to ensure Cyber security of both sites when dealing with physical security perimeters? Even though I may not be using the primary site for control I still have to protect it. I suggest new wording of "... does not depend on the primary control center for its functional operations". Or words to that effect.

It is helpful to the Utility Industry if Measurements, Compliance, Data Retention, VSL's, ect are in the draft standard. This allows us to see the whole picture of what is being proposed. It may even speed up the SAR process.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Please use this form to submit comments on the 1st draft of the standards for Backup Facilities (Project 2006-04). Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "BF Standards" in the subject line. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Doug Rempel	
Organization:	Manitoba Hydro	
Telephone:	204 487 5427	
E-mail:	dbrempel@hydro.mb.ca	
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input checked="" type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input checked="" type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input checked="" type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background Information

The Backup Facilities Standard Drafting Team (SDT) is submitting these questions as part of its initial effort in revising EOP-008. Extensive revisions have been made to the existing standard. Many of these changes are a direct result of comments received from industry and from FERC Order 693.

The SDT is attempting to come up with practical limits as to which Transmission Operators (TOPs) need to be covered by this standard. This is to avoid placing undue burdens on small entities that would not have a deleterious effect on the reliability of the Interconnection. In that same vein, the SDT is allowing TOPs and BAs to provide needed backup functionality through third-party contract services. Again, this is an effort to reduce the burden on these entities without adversely impacting reliability.

The SDT has not included the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard. This position is in conflict with a directive in FERC Order 693. The SDT has discussed this issue at length and has been unable to come up with a reliability-based reason for centrally dispatched GOP inclusion. However, this position will need to be defended at FERC when this standard is filed. Along those lines, the SDT is working on a position paper outlining the reasons for this approach. A specific question has been included on this topic with a direct request for inputs from GOPs. In general, the SDT must provide an alternative approach that presents an equally effective and efficient solution to the one proposed in FERC Order 693. This could include items such as suggesting strengthening other standards, presenting business practices that may be followed now that would preclude the need for a backup control center, lesser cost alternatives, etc.

The SDT has also established timeframes for when backup capability must be available. These time frames are different for Reliability Coordinators (RCs) versus TOPs and BAs. Specific questions asking for feedback on these times have been included below. In addition, questions related to times involved for testing and re-establishment of primary/backup capability have been raised.

The Backup Facilities Standard Drafting Team would like to receive industry comments on this revised standard. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "BF Standards" by **March 7, 2008**.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

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

1. The SDT has attempted to limit the applicability provisions for Transmission Operators in this standard. Do you agree with this limitation? If not, please provide the reasons and alternatives.

Yes

No

Comments: The TOP is as responsible as any entity in operating the BES, therefore their facilities are as important to the reliable operation of the BES as an RC or BA. I fail to see how the applicability is limited by the statement in the applicability section 4.1.2, any TOP with an EMS/SCADA system has critical assets and needs to protect against the loss of those assets.

2. The SDT has decided not to include the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard at this time. The SDT believes that there are other equally efficient and effective methods for the GOPs to continue to fulfill their role in preserving the reliability of the Interconnection following the loss of its control center. This position is contrary to a directive in FERC Order 693. The SDT will need to provide specific reasoning to FERC for adopting such an approach and is therefore, soliciting opinions from the industry. Do you agree with this approach? If not, please state the reasons and suggest an alternative. The SDT is particularly interested in receiving inputs from GOPs as to how they currently handle such a situation.

Yes

No

Comments: The GOP still needs to have a plan to continue its operations should they lose control centre functionality. The GOP may not be required to meet every requirement in the standard but they should have a plan to continue operations as per Requirement 1.

3. Requirement R6 — Do you think that the 2-hour transition time frame for Reliability Coordinators is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

4. Requirement R7, R8.1, and R8.2 — Do you think the 2 to 6-hour time frame for applicable Transmission Operators and Balancing Authorities is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: The time frame is too long, a lot can happen in six hours including mother nature dropping a lightning storm on top of the entity, which can cause much greater

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

problems to the entity than the limited control they have during a transition period. I would suggest a time period of two hours.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

5. Requirement R12 — Do you think that implementation or testing operations for a minimum of two hours annually is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: I think the time frame should be left up to the entity, they just have to ensure the backup is tested thoroughly.

6. Requirement R13 — The SDT proposes that within 6 calendar months of having lost its primary control center or backup capability that an entity will have a plan in place for re-establishing backup capability. Is 6 calendar months appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: I agree with MISO's comments in that this belongs in business continuity planning and should not be in the standard.

7. If you are aware of any regional variances that would be required as a result of this standard, or if you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement, please identify them here.

Yes

No

Comments:

8. If you have any other comments on the proposed standard that you haven't already provided in response to the questions above, please provide them here.

Yes

No

Comments: Requirement R1.1 is too loose and is open to interpretation.

Does R1.6 include the roles of support personnel including field personnel that may be required to staff stations during the transfer?

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Please use this form to submit comments on the 1st draft of the standards for Backup Facilities (Project 2006-04). Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "BF Standards" in the subject line. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Donald E. Nelson
Organization:	Massachusetts Department of Public Utilities
Telephone:	617-305-3657
E-mail:	Donald.E.Nelson@state.ma.us
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/> 2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/> 3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/> 4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/> 5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/> 6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/> 7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/> 8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input checked="" type="checkbox"/> 9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/> 10 — Regional Reliability Organizations and Regional Entities

Background Information

The Backup Facilities Standard Drafting Team (SDT) is submitting these questions as part of its initial effort in revising EOP-008. Extensive revisions have been made to the existing standard. Many of these changes are a direct result of comments received from industry and from FERC Order 693.

The SDT is attempting to come up with practical limits as to which Transmission Operators (TOPs) need to be covered by this standard. This is to avoid placing undue burdens on small entities that would not have a deleterious effect on the reliability of the Interconnection. In that same vein, the SDT is allowing TOPs and BAs to provide needed backup functionality through third-party contract services. Again, this is an effort to reduce the burden on these entities without adversely impacting reliability.

The SDT has not included the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard. This position is in conflict with a directive in FERC Order 693. The SDT has discussed this issue at length and has been unable to come up with a reliability-based reason for centrally dispatched GOP inclusion. However, this position will need to be defended at FERC when this standard is filed. Along those lines, the SDT is working on a position paper outlining the reasons for this approach. A specific question has been included on this topic with a direct request for inputs from GOPs. In general, the SDT must provide an alternative approach that presents an equally effective and efficient solution to the one proposed in FERC Order 693. This could include items such as suggesting strengthening other standards, presenting business practices that may be followed now that would preclude the need for a backup control center, lesser cost alternatives, etc.

The SDT has also established timeframes for when backup capability must be available. These time frames are different for Reliability Coordinators (RCs) versus TOPs and BAs. Specific questions asking for feedback on these times have been included below. In addition, questions related to times involved for testing and re-establishment of primary/backup capability have been raised.

The Backup Facilities Standard Drafting Team would like to receive industry comments on this revised standard. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "BF Standards" by **March 7, 2008**.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

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

1. The SDT has attempted to limit the applicability provisions for Transmission Operators in this standard. Do you agree with this limitation? If not, please provide the reasons and alternatives.

Yes

No

Comments:

2. The SDT has decided not to include the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard at this time. The SDT believes that there are other equally efficient and effective methods for the GOPs to continue to fulfill their role in preserving the reliability of the Interconnection following the loss of its control center. This position is contrary to a directive in FERC Order 693. The SDT will need to provide specific reasoning to FERC for adopting such an approach and is therefore, soliciting opinions from the industry. Do you agree with this approach? If not, please state the reasons and suggest an alternative. The SDT is particularly interested in receiving inputs from GOPs as to how they currently handle such a situation.

Yes

No

Comments:

3. Requirement R6 — Do you think that the 2-hour transition time frame for Reliability Coordinators is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: R1.8 of the existing standard - while not placing an absolute deadline - envisions that the backup for the primary control facility of the reliability coordinator will be operational within one hour. There is no explanation as to why one hour is no longer a credible target timeframe for backup facility operation and needs to be doubled to two hours.

A more rationale approach is to institute a plan that is expected to have the backup control facility functional within one hour, but if there are unforeseen circumstances that prevent operation within one hour, then there will not be a penalty associated with the second hour. An example would be that if the circumstances that disabled the primary control facilities made access to the backup difficult (e.g. flood that took out both the control center and surrounding roads) and it physically took longer than expected to reach the backup center, then there would be no penalty until two hours elapsed. However, if the event was a computer glitch and there were no significant obstacles to reaching the backup facilities, the one hour limit would control.

If this proposal is unworkable from a standards drafting perspective, the standard should only allow a one hour transition time consistent with the existing standard instead of a two hour limit as proposed. The longer the system is outside of a standard operating

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

mode there is a higher risk of serious reliability problems, which should not be allowed at the reliability coordinator level.

4. Requirement R7, R8.1, and R8.2 — Do you think the 2 to 6-hour time frame for applicable Transmission Operators and Balancing Authorities is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: Regardless of the timeframe between a primary control center going down and activation of the backup facility, having a plan in place to seamlessly operate the system is paramount. As stated in question 3, one hour should be used for the reliability coordinator instead of two hours.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

5. Requirement R12 — Do you think that implementation or testing operations for a minimum of two hours annually is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

6. Requirement R13 — The SDT proposes that within 6 calendar months of having lost its primary control center or backup capability that an entity will have a plan in place for re-establishing backup capability. Is 6 calendar months appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

7. If you are aware of any regional variances that would be required as a result of this standard, or if you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement, please identify them here.

Yes

No

Comments:

8. If you have any other comments on the proposed standard that you haven't already provided in response to the questions above, please provide them here.

Yes

No

Comments:

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Please use this form to submit comments on the 1st draft of the standards for Backup Facilities (Project 2006-04). Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "BF Standards" in the subject line. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

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

Background Information

The Backup Facilities Standard Drafting Team (SDT) is submitting these questions as part of its initial effort in revising EOP-008. Extensive revisions have been made to the existing standard. Many of these changes are a direct result of comments received from industry and from FERC Order 693.

The SDT is attempting to come up with practical limits as to which Transmission Operators (TOPs) need to be covered by this standard. This is to avoid placing undue burdens on small entities that would not have a deleterious effect on the reliability of the Interconnection. In that same vein, the SDT is allowing TOPs and BAs to provide needed backup functionality through third-party contract services. Again, this is an effort to reduce the burden on these entities without adversely impacting reliability.

The SDT has not included the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard. This position is in conflict with a directive in FERC Order 693. The SDT has discussed this issue at length and has been unable to come up with a reliability-based reason for centrally dispatched GOP inclusion. However, this position will need to be defended at FERC when this standard is filed. Along those lines, the SDT is working on a position paper outlining the reasons for this approach. A specific question has been included on this topic with a direct request for inputs from GOPs. In general, the SDT must provide an alternative approach that presents an equally effective and efficient solution to the one proposed in FERC Order 693. This could include items such as suggesting strengthening other standards, presenting business practices that may be followed now that would preclude the need for a backup control center, lesser cost alternatives, etc.

The SDT has also established timeframes for when backup capability must be available. These time frames are different for Reliability Coordinators (RCs) versus TOPs and BAs. Specific questions asking for feedback on these times have been included below. In addition, questions related to times involved for testing and re-establishment of primary/backup capability have been raised.

The Backup Facilities Standard Drafting Team would like to receive industry comments on this revised standard. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "BF Standards" by **March 7, 2008**.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

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

1. The SDT has attempted to limit the applicability provisions for Transmission Operators in this standard. Do you agree with this limitation? If not, please provide the reasons and alternatives.

Yes

No

Comments: This standard should apply to all RCs, BAs, and TOPs. If an entity is registered as an TOP, their transmission system is part of the BES. Any part of the BES could become limited by an IROL under certain conditions. Furthermore, these entities are responsible for identifying their own Critical Assets and IROLs. Thus, this is equivalent to letting a given TOP decide if a standard applies to them. Letting a responsible entity determine if a standard applies to them is a form of self-regulation.

This is really a registration issue that should be determined by the Regional Entities. If the RE determines an entity meets the TOP registration criteria, then that entity should be subject to the same standards as any other TOP.

2. The SDT has decided not to include the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard at this time. The SDT believes that there are other equally efficient and effective methods for the GOPs to continue to fulfill their role in preserving the reliability of the Interconnection following the loss of its control center. This position is contrary to a directive in FERC Order 693. The SDT will need to provide specific reasoning to FERC for adopting such an approach and is therefore, soliciting opinions from the industry. Do you agree with this approach? If not, please state the reasons and suggest an alternative. The SDT is particularly interested in receiving inputs from GOPs as to how they currently handle such a situation.

Yes

No

Comments: Standards are not supposed to define the "how" but rather they are supposed to define the "what". The SDT is focused on the "how". Within this very question, the SDT acknowledges that there are other equally effective and efficient methods for the GOPs to continue to fulfill their role in preserving reliability. We agree that is true, however, the SDT needs to define that role in preserving reliability. For instance, does the GOP need to have a plan to continue to dispatch the units in the event their central dispatch office fails? That plan could involve a number of solutions but the role is a focused on "what" needs to be accomplished.

3. Requirement R6 — Do you think that the 2-hour transition time frame for Reliability Coordinators is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: Why did the standards drafting team increase the transition time frame from the one hour requirement in the existing standards? The drafting team needs to provide strong justification for this. If all RCs are currently meeting the standard one hour

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

transition time frame in the existing standards, it is hard to fathom any reason to increase it.

Rather than specify a time frame for transition, we suggest alternative approach that is more justifiable. This approach would require the responsible entity to have minimal capability to meet the core set of applicable requirements during the transition. The drafting team will need to identify those core set of requirements.

4. Requirement R7, R8.1, and R8.2 — Do you think the 2 to 6-hour time frame for applicable Transmission Operators and Balancing Authorities is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: Mosts RCs only have functional control of the transmission system. They will be helpless to have directives implemented if the TOP or BA does not have a functioning control center or alternate plan to perform actions such as switching in the field or dispatch at the plant. Thus, a six hour outage of a BA could in effect be equivalent to a six-hour outage of the RC. These times should match what is ultimately decided for the RC unless our alternative approach in our response to question three is adopted.

Our alternative approach presented in our comments in question three should apply here as well. It is included below.

Rather than specify a time frame for transition, we suggest alternative approach that is more justifiable. This approach would require the responsible entity to have minimal capability to meet the core set of applicable requirements during the transition. The drafting team will need to identify those core set of requirements.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

5. Requirement R12 — Do you think that implementation or testing operations for a minimum of two hours annually is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: There should be a minimum amount of testing required. However, we don't see a justification for two hours. Why not one or three? The SDT should establish a justification for this important time frame. It should not be arbitrary or based on judgment.

6. Requirement R13 — The SDT proposes that within 6 calendar months of having lost its primary control center or backup capability that an entity will have a plan in place for re-establishing backup capability. Is 6 calendar months appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: This requirement is trying to anticipate every conceivable situation that could occur. Standards should not be written to anticipate all possible situations. In reality, this is a business continuity issue and does not belong in the standard. Most professionals with business continuity responsibilities will tell you that the risk of losing your main control center for such an extended period is extremely low. Most likely an entity will only have to operate out of their backup control center for a short period of time and will be able to re-occupy their main control center. Additionally, there are simply too many variables involved in establishing new backup capability for an extended period of time. The ERO and REs will simply have to work closely with the affected entity to develop a plan to restore backup capability given this improbable situation.

7. If you are aware of any regional variances that would be required as a result of this standard, or if you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement, please identify them here.

Yes

No

Comments: Allowing a BA or TOP to in effect determine if the standard applies to them because they determine their critical assets and/or IROs is equivalent to self-regulation which is clearly a violation of the legislation establishing a requirement for the ERO.

8. If you have any other comments on the proposed standard that you haven't already provided in response to the questions above, please provide them here.

Yes

No

Comments: In general, this requirement is overly detailed and broad. There are really only three basic requirements for establishing backup operational capability. Those three requirements are:

1. Have a plan
2. Test plan
3. Implement when needed.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Any requirements beyond these three basic requirements will only detract from reliability because they will cause entities to focus on requirements outside of these basics.

Many of the subrequirements in this standard are not requirements at all. Rather they are criteria or lead-in statements for other subrequirements. This is problematic because the FERC has established VRFs for subrequirements in the past that are really not requirements and is now requiring the establishment of VSLs for many subrequirements that are not requirements at all or may even be explanatory text. This draft standard is perpetuating this problem.

Any subrequirements that are criteria should simply be listed as bullets under the requirement with the requirement specifying that it is subject to the following criteria. For instance, all subrequirements under R1 do not really have any requirement. They are simply a list of what should be included in the plan identified in R1 or explanatory text. Thus, many of these sub-requirements should simply become bullets. This would also aid in the establishment of multiple VSLs because an entity that has a plan but is only missing couple of the requirements might have a low VSL. Whereas an entity, not having a plan would then fall into the SEVERE VSL.

R1.1 is not necessary but is simply a part of a plan. A plan doesn't exist if it doesn't identify where and how. This could be specified as a criterion for the plan.

R1.2 is unnecessary. First, high level is subjective. Requirements should not be subjective. Secondly, each of the sub-requirements under it will stand alone without R1.2.

R1.3 should be modified. What it really needs to state is that the backup functionality needs to have current BES data. It should not be tied to what the primary control center has because the primary control center data may be out of synch with the BES. This would be a reason to utilize the backup functionality.

R1.4 is not necessary. The subrequirements under it do an adequate job of spelling out the basic minimum requirements without the introductory statement that R1.4 is. A third criteria should be added that identifies who makes the decision.

R2 is not necessary if there is going to be timing requirements for bringing the backup functionality. It is a good idea but should not be a requirement. In effect, requiring the backup functionality to be functioning in x amount of time will cause the responsible entity to have the plan at their fingertips. Additionally, a properly trained system operator should be able to implement the plan without referring to the plan.

R3 is a requirement that is an example of an attempt to write the standard for a every conceivable situation and is not necessary. If a responsible entity has to use other entities to implement its backup functionality, it will be explicitly included or they will not have a plan that they can test. Thus, they will not meet requirement.

R4 should be modified to require each RC to have arranged for the availability of a backup control center. This requirement will then be more succinct, as stringent, and provide the RC flexibility to make necessary business arrangements to provide a backup center. There is nothing especially important about the RC owning its own backup control center or utilizing another RC's control center. It is possible that a third party that is not an RC might be willing to develop a control center to serve as a backup for multiple parties. As long as the requirement functionality is provided, why would this be a problem? The requirement as written would preclude this satisfactory arrangement.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

R5 is really redundant to R1. If a BA and TOP must have a plan to have backup functionality, they have met Requirement 5. Let's not create an opportunity for double jeopardy.

Requirement 8 and all of its subrequirements are not really requirements. It really is criteria for R1.

Requirement 9 should remove the requirement to have the plan approved by a manager. This is really a business process requirement and does nothing to ensure reliability. Besides, Requirement 13 will cause this to happen anyway. Do you really think that the plan can be tested annually without a manager's approval?

R10 and R11 is not really a requirement. It belongs as a criterion under R1.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Please use this form to submit comments on the 1st draft of the standards for Backup Facilities (Project 2006-04). Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "BF Standards" in the subject line. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

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

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

Group Name: MRO NSRSi

Lead Contact: Michael Brytowski

Contact Organization: MRO

Contact Segment: 10

Contact Telephone: 651-855-1728

Contact E-mail: mj.brytowski@midwestreliability.org

Additional Member Name	Additional Member Organization	Region*	Segment*
Neal Balu	WPS	MRO	3,4,5,6
Terry Bilke	MISO	MRO	2
Robert Coish	MHEB	MRO	1,3,5,6
Carol Gerou	MP	MRO	1,3,5,6
Jim Haigh	WAPA	MRO	1,6
Ken Goldsmith	ALTW	MRO	4
Tom Mielnik	MEC	MRO	1,3,5,6
Pam Oreschnick	XCEL	MRO	1,3,5,6
Dave Rudolph	BEPC	MRO	1,3,5,6
Eric Ruskamp	LES	MRO	1,3,5,6
Joseph Knight	GRE	MRO	1,3,5,6
Michael Brytowski	MRO	MRO	10
Larry Brusseau	MRO	MRO	10
Joseph DePoorter	MGE	MRO	3,4,5,6
Wayne Guttormson	SaskPower	MRO	1,3

*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

Background Information

The Backup Facilities Standard Drafting Team (SDT) is submitting these questions as part of its initial effort in revising EOP-008. Extensive revisions have been made to the existing standard. Many of these changes are a direct result of comments received from industry and from FERC Order 693.

The SDT is attempting to come up with practical limits as to which Transmission Operators (TOPs) need to be covered by this standard. This is to avoid placing undue burdens on small entities that would not have a deleterious effect on the reliability of the Interconnection. In that same vein, the SDT is allowing TOPs and BAs to provide needed backup functionality through third-party contract services. Again, this is an effort to reduce the burden on these entities without adversely impacting reliability.

The SDT has not included the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard. This position is in conflict with a directive in FERC Order 693. The SDT has discussed this issue at length and has been unable to come up with a reliability-based reason for centrally dispatched GOP inclusion. However, this position will need to be defended at FERC when this standard is filed. Along those lines, the SDT is working on a position paper outlining the reasons for this approach. A specific question has been included on this topic with a direct request for inputs from GOPs. In general, the SDT must provide an alternative approach that presents an equally effective and efficient solution to the one proposed in FERC Order 693. This could include items such as suggesting strengthening other standards, presenting business practices that may be followed now that would preclude the need for a backup control center, lesser cost alternatives, etc.

The SDT has also established timeframes for when backup capability must be available. These time frames are different for Reliability Coordinators (RCs) versus TOPs and BAs. Specific questions asking for feedback on these times have been included below. In addition, questions related to times involved for testing and re-establishment of primary/backup capability have been raised.

The Backup Facilities Standard Drafting Team would like to receive industry comments on this revised standard. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "BF Standards" by **March 7, 2008**.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

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

1. The SDT has attempted to limit the applicability provisions for Transmission Operators in this standard. Do you agree with this limitation? If not, please provide the reasons and alternatives.

Yes

No

Comments: No, according to the NERC glossary of terms the transmission operator is that "... entity (which is responsible) for reliability of its "local" transmission system, and that operates or directs the operation of the transmission facilities." Taking this into account, this standard speaks to the lost of these transmission facilities and how the transmission operator plans to handle these lost facilities. All transmission operators which operate Bulk Electric System should be applicable to this standard since bulk electric facilities, systems, and equipment which if destroyed, degraded, or otherwise rendered unavailable would affect the reliability or operability of the BES since the BES would no longer be capable of functioning. (Also, please note I am not referring to the lost of one transmission line or a generator but a loss of an entire "local" transmission system operated by a transmission operator.) Is it possible for a transmission operator to operate a transmission facility which is not included in the BES? If so, then perhaps this standard should not apply to them. Please give an example of a transmission operator who does not operate BES facilities?

2. The SDT has decided not to include the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard at this time. The SDT believes that there are other equally efficient and effective methods for the GOPs to continue to fulfill their role in preserving the reliability of the Interconnection following the loss of its control center. This position is contrary to a directive in FERC Order 693. The SDT will need to provide specific reasoning to FERC for adopting such an approach and is therefore, soliciting opinions from the industry. Do you agree with this approach? If not, please state the reasons and suggest an alternative. The SDT is particularly interested in receiving inputs from GOPs as to how they currently handle such a situation.

Yes

No

Comments: The SDT should include the Generator Operator within this standard especially if GOP can efficiently and effectively fulfill their role in preserving the reliability of the interconnection following the loss of the GOP's control center.

3. Requirement R6 — Do you think that the 2-hour transition time frame for Reliability Coordinators is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: Not sure, where did the 2-hour transition time frame come from? Is it reasonable to assume that 2 hours may not be possible? For example, what if a snow/ice storm of the century hits the control area in question? The ice storm renders the primary control center inoperable. Mobility to the backup control center is arrested

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

due to massive snow fall. Is a Reliability Coordinator still reasonably expected to have the backup control center operational within 2 hours after the loss of the primary control center? The weather I describe is probable and it's planned for in designing facilities shouldn't we at least consider this situation as a possibility? To account for this possibility perhaps this time frame and the other time frames listed in this standard should be modified to allow the Compliance Monitor the option to arrest this requirement during natural destroyers or not prescribe a specific time period but say to operators you must make every foreseeable effort to transition as soon as possible.

4. Requirement R7, R8.1, and R8.2 — Do you think the 2 to 6-hour time frame for applicable Transmission Operators and Balancing Authorities is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: The MRO would like to question why in this era of "hot" standby systems would it take an RC 6 hours to get their backup site operating? The MRO would like the SDT to share the methodology they used in determining these time periods.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

5. Requirement R12 — Do you think that implementation or testing operations for a minimum of two hours annually is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: That depends on the conditions during the test. Operators may not be aware of specific issues with the back up control center if they only operate that location for two hour annually, plus, issues may emerge outside the 2 hour testing operational period; It's difficult to say what those issues may be at this time.

6. Requirement R13 — The SDT proposes that within 6 calendar months of having lost its primary control center or backup capability that an entity will have a plan in place for re-establishing backup capability. Is 6 calendar months appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: Appropriateness depends on what is needed to show the re-establishment of backup capability. What if an action is contingent upon restraints that may take awhile to process like a building permit or limiting weather conditions restricting the re-establishment process(es)?

7. If you are aware of any regional variances that would be required as a result of this standard, or if you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement, please identify them here.

Yes

No

Comments: N/A

8. If you have any other comments on the proposed standard that you haven't already provided in response to the questions above, please provide them here.

Yes

No

Comments: During the transitional period were neither the primary or the backup control center are fully functionable, should the system operator have a copy of the transitional operating plan, a copy of the system one lines, and a list of all entities that they need to notify of a change in operating location? For example, lets say the primary control center is not functionable. The system operators become mobilized to make their way to the backup control center. They have everything they need, laptops, satellite phones, etc but they don't have a copy of the transitional operating plan, a copy of the system one lines, and a list of all entities that they need to notify of a change in operating location until, they get to the back up control center. What if they are not able to get to the backup control center, but could wirelessly access the backup control center capabilities, thus allowing them to perform but in a limited fashion since they don't have the transitional operating plan, a copy of the system one lines, and a list of all entities that they need to notify of a change in operating location? Thus, the SDT should address the transitional period in a more developed fashion perhaps allowing the

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

system operators to operate from another location other than the backup control center if need be found and the system operators have that capability.

R9. Each Reliability Coordinator, Balancing Authority, and applicable Transmission Operator, shall have its Operating Plan for backup functionality reviewed and approved annually by a manager.

The reference to the manager should be removed. NERC should only be concerned with having the RC, BA, and TOP annually review its plan. Requiring approval of anything internal is outside the scope of a NERC reliability standard, though they have used this concept in other standards.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Please use this form to submit comments on the 1st draft of the standards for Backup Facilities (Project 2006-04). Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "BF Standards" in the subject line. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Tony Eddleman	
Organization:	Nebraska Public Power District	
Telephone:	402-845-5253	
E-mail:	teddle@nppd.com	
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input checked="" type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input checked="" type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background Information

The Backup Facilities Standard Drafting Team (SDT) is submitting these questions as part of its initial effort in revising EOP-008. Extensive revisions have been made to the existing standard. Many of these changes are a direct result of comments received from industry and from FERC Order 693.

The SDT is attempting to come up with practical limits as to which Transmission Operators (TOPs) need to be covered by this standard. This is to avoid placing undue burdens on small entities that would not have a deleterious effect on the reliability of the Interconnection. In that same vein, the SDT is allowing TOPs and BAs to provide needed backup functionality through third-party contract services. Again, this is an effort to reduce the burden on these entities without adversely impacting reliability.

The SDT has not included the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard. This position is in conflict with a directive in FERC Order 693. The SDT has discussed this issue at length and has been unable to come up with a reliability-based reason for centrally dispatched GOP inclusion. However, this position will need to be defended at FERC when this standard is filed. Along those lines, the SDT is working on a position paper outlining the reasons for this approach. A specific question has been included on this topic with a direct request for inputs from GOPs. In general, the SDT must provide an alternative approach that presents an equally effective and efficient solution to the one proposed in FERC Order 693. This could include items such as suggesting strengthening other standards, presenting business practices that may be followed now that would preclude the need for a backup control center, lesser cost alternatives, etc.

The SDT has also established timeframes for when backup capability must be available. These time frames are different for Reliability Coordinators (RCs) versus TOPs and BAs. Specific questions asking for feedback on these times have been included below. In addition, questions related to times involved for testing and re-establishment of primary/backup capability have been raised.

The Backup Facilities Standard Drafting Team would like to receive industry comments on this revised standard. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "BF Standards" by **March 7, 2008**.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

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

1. The SDT has attempted to limit the applicability provisions for Transmission Operators in this standard. Do you agree with this limitation? If not, please provide the reasons and alternatives.

Yes

No

Comments:

2. The SDT has decided not to include the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard at this time. The SDT believes that there are other equally efficient and effective methods for the GOPs to continue to fulfill their role in preserving the reliability of the Interconnection following the loss of its control center. This position is contrary to a directive in FERC Order 693. The SDT will need to provide specific reasoning to FERC for adopting such an approach and is therefore, soliciting opinions from the industry. Do you agree with this approach? If not, please state the reasons and suggest an alternative. The SDT is particularly interested in receiving inputs from GOPs as to how they currently handle such a situation.

Yes

No

Comments:

3. Requirement R6 — Do you think that the 2-hour transition time frame for Reliability Coordinators is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: The 2-hour transition time is too restrictive - recommend a minimum of six hours.

4. Requirement R7, R8.1, and R8.2 — Do you think the 2 to 6-hour time frame for applicable Transmission Operators and Balancing Authorities is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: This standard addresses an event that probably will never happen for the vast majority of TO's and BA's. Shorter time frames require more elaborate and expensive systems (i.e. hot back-up versus cold back-up). The additional complexity isn't justified by the probability of having an event. Instead of two hours, the time to transition functions to the backup should be six hours. The backup should be fully functional within 24 hours after the event. An actual event, noted to be extremely rare to occur, will probably result in the loss of human life and infrastructure. The initial discovery and realization to implement the backup will be delayed by emergency

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

response and the real-world crisis. Shorter response times could require 7 X 24 staffing at the Backup Facility. I'm not aware of a significant number of actual events that had demonstrated this need.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

5. Requirement R12 — Do you think that implementation or testing operations for a minimum of two hours annually is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

6. Requirement R13 — The SDT proposes that within 6 calendar months of having lost its primary control center or backup capability that an entity will have a plan in place for re-establishing backup capability. Is 6 calendar months appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: As long as it's a plan for re-establishing backup capability and not the actual backup capability restored in six months, this requirement is achievable.

7. If you are aware of any regional variances that would be required as a result of this standard, or if you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement, please identify them here.

Yes

No

Comments:

8. If you have any other comments on the proposed standard that you haven't already provided in response to the questions above, please provide them here.

Yes

No

Comments:

Paragraph A.5. - Recommend a minimum of 36 months to implement the requirements in the standard after the effective date before the standard is auditable.

Paragraph B.R9. - Delete, "by a manager". Each entity should decide who has review and approval authority for its Operating Plan.

Paragraph B.R9.1. - Requiring the Operating Plan to be updated and re-approved within sixty calendar days of any change is too restrictive. Major changes would require an update to the plan, but most changes could wait for the annual review.

Paragraph B.R11. - Requiring a Backup Facility to be capable of operating for an indefinite period of time increases the complexity and adds unnecessary costs to the facility. Is this requirement mandating training facilities at the backup, including simulators, plus all the support staff for a Control Center. These functions are best addressed through an interium plan developed after the event occurs; then, permanent facilities implemented with a plan to restore the primary. The actual situation that occurs will dictate how much and to what extent these are needed.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

General Comment: Our utility has spent a considerable amount on our primary facility to harden the facility and provide redundancy. Requiring us to invest in a fully operative backup facility redirects funding from needed infrastructure improvements in other areas. The actual probability and risk of needing a backup facility are very minimal, compared to transmission infrastructure improvements that clearly will provide value through increased ratings and reliability. Recommend the existing NERC requirements to have a plan to continue operations in the event its control center becomes inoperable be retained and the new requirements for a fully functional backup facility be eliminated. If this recommendation is not implemented, please provide justification from actual situations why these requirements are required.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Please use this form to submit comments on the 1st draft of the standards for Backup Facilities (Project 2006-04). Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "BF Standards" in the subject line. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Diane Barney
Organization:	New York State Dept of Public Service
Telephone:	518-486-2943
E-mail:	diane_barney@dps.state.ny.us
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/> 2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/> 3 — Load-serving Entities
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/> 4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/> 5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/> 6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/> 7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/> 8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input checked="" type="checkbox"/> 9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/> 10 — Regional Reliability Organizations and Regional Entities

Background Information

The Backup Facilities Standard Drafting Team (SDT) is submitting these questions as part of its initial effort in revising EOP-008. Extensive revisions have been made to the existing standard. Many of these changes are a direct result of comments received from industry and from FERC Order 693.

The SDT is attempting to come up with practical limits as to which Transmission Operators (TOPs) need to be covered by this standard. This is to avoid placing undue burdens on small entities that would not have a deleterious effect on the reliability of the Interconnection. In that same vein, the SDT is allowing TOPs and BAs to provide needed backup functionality through third-party contract services. Again, this is an effort to reduce the burden on these entities without adversely impacting reliability.

The SDT has not included the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard. This position is in conflict with a directive in FERC Order 693. The SDT has discussed this issue at length and has been unable to come up with a reliability-based reason for centrally dispatched GOP inclusion. However, this position will need to be defended at FERC when this standard is filed. Along those lines, the SDT is working on a position paper outlining the reasons for this approach. A specific question has been included on this topic with a direct request for inputs from GOPs. In general, the SDT must provide an alternative approach that presents an equally effective and efficient solution to the one proposed in FERC Order 693. This could include items such as suggesting strengthening other standards, presenting business practices that may be followed now that would preclude the need for a backup control center, lesser cost alternatives, etc.

The SDT has also established timeframes for when backup capability must be available. These time frames are different for Reliability Coordinators (RCs) versus TOPs and BAs. Specific questions asking for feedback on these times have been included below. In addition, questions related to times involved for testing and re-establishment of primary/backup capability have been raised.

The Backup Facilities Standard Drafting Team would like to receive industry comments on this revised standard. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "BF Standards" by **March 7, 2008**.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

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

1. The SDT has attempted to limit the applicability provisions for Transmission Operators in this standard. Do you agree with this limitation? If not, please provide the reasons and alternatives.

Yes

No

Comments:

2. The SDT has decided not to include the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard at this time. The SDT believes that there are other equally efficient and effective methods for the GOPs to continue to fulfill their role in preserving the reliability of the Interconnection following the loss of its control center. This position is contrary to a directive in FERC Order 693. The SDT will need to provide specific reasoning to FERC for adopting such an approach and is therefore, soliciting opinions from the industry. Do you agree with this approach? If not, please state the reasons and suggest an alternative. The SDT is particularly interested in receiving inputs from GOPs as to how they currently handle such a situation.

Yes

No

Comments:

3. Requirement R6 — Do you think that the 2-hour transition time frame for Reliability Coordinators is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: R1.8 of the existing standard - while not placing an absolute deadline - envisions that the backup for the primary control facility of the reliability coordinator will be operational within one hour. There is no explanation as to why one hour is no longer a credible target timeframe for backup facility operation and needs to be double to two hours.

A more rationale approach is to institute a plan that is expected to have the backup control facility functional within one hour, but if there are unforeseen circumstances that prevent operation within one hour, then there will not be a penalty associated with the second hour. An example would be that if the circumstances that disabled the primary control facilities made access to the backup difficult (e.g. flood that took out both the control center and surrounding roads) and it physically took longer than expected to reach the backup center, then there would be no penalty until two hours elapsed. However, if the event was a computer glitch and there were no significant obstacles to reaching the backup facilities, the one hour limit would control.

If this proposal is unworkable from a standards drafting perspective, the standard should only allow a one hour transition time consistent with the existing standard instead of a two hour limit as proposed. The longer the system is outside of a standard operating

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

mode there is a higher risk of serious reliability problems, which should not be allowed at the reliability coordinator level.

4. Requirement R7, R8.1, and R8.2 — Do you think the 2 to 6-hour time frame for applicable Transmission Operators and Balancing Authorities is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: Regardless of the timeframe between a primary control center going down and activation of the backup facility, having a plan in place to seamlessly operate the system is paramount. As stated in question 3, one hour should be used for the reliability coordinator instead of two hours.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

5. Requirement R12 — Do you think that implementation or testing operations for a minimum of two hours annually is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

6. Requirement R13 — The SDT proposes that within 6 calendar months of having lost its primary control center or backup capability that an entity will have a plan in place for re-establishing backup capability. Is 6 calendar months appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

7. If you are aware of any regional variances that would be required as a result of this standard, or if you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement, please identify them here.

Yes

No

Comments:

8. If you have any other comments on the proposed standard that you haven't already provided in response to the questions above, please provide them here.

Yes

No

Comments:

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Please use this form to submit comments on the 1st draft of the standards for Backup Facilities (Project 2006-04). Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "BF Standards" in the subject line. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

Individual Commenter Information (Complete this page for comments from one organization or individual.)		
Name:	Rick White	
Organization:	Northeast Utilities	
Telephone:	860-665-2572	
E-mail:	whitefb@nu.com	
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background Information

The Backup Facilities Standard Drafting Team (SDT) is submitting these questions as part of its initial effort in revising EOP-008. Extensive revisions have been made to the existing standard. Many of these changes are a direct result of comments received from industry and from FERC Order 693.

The SDT is attempting to come up with practical limits as to which Transmission Operators (TOPs) need to be covered by this standard. This is to avoid placing undue burdens on small entities that would not have a deleterious effect on the reliability of the Interconnection. In that same vein, the SDT is allowing TOPs and BAs to provide needed backup functionality through third-party contract services. Again, this is an effort to reduce the burden on these entities without adversely impacting reliability.

The SDT has not included the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard. This position is in conflict with a directive in FERC Order 693. The SDT has discussed this issue at length and has been unable to come up with a reliability-based reason for centrally dispatched GOP inclusion. However, this position will need to be defended at FERC when this standard is filed. Along those lines, the SDT is working on a position paper outlining the reasons for this approach. A specific question has been included on this topic with a direct request for inputs from GOPs. In general, the SDT must provide an alternative approach that presents an equally effective and efficient solution to the one proposed in FERC Order 693. This could include items such as suggesting strengthening other standards, presenting business practices that may be followed now that would preclude the need for a backup control center, lesser cost alternatives, etc.

The SDT has also established timeframes for when backup capability must be available. These time frames are different for Reliability Coordinators (RCs) versus TOPs and BAs. Specific questions asking for feedback on these times have been included below. In addition, questions related to times involved for testing and re-establishment of primary/backup capability have been raised.

The Backup Facilities Standard Drafting Team would like to receive industry comments on this revised standard. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "BF Standards" by **March 7, 2008**.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

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

1. The SDT has attempted to limit the applicability provisions for Transmission Operators in this standard. Do you agree with this limitation? If not, please provide the reasons and alternatives.

Yes

No

Comments:

2. The SDT has decided not to include the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard at this time. The SDT believes that there are other equally efficient and effective methods for the GOPs to continue to fulfill their role in preserving the reliability of the Interconnection following the loss of its control center. This position is contrary to a directive in FERC Order 693. The SDT will need to provide specific reasoning to FERC for adopting such an approach and is therefore, soliciting opinions from the industry. Do you agree with this approach? If not, please state the reasons and suggest an alternative. The SDT is particularly interested in receiving inputs from GOPs as to how they currently handle such a situation.

Yes

No

Comments: An individual generator should not impact the reliability of the BPS.

3. Requirement R6 — Do you think that the 2-hour transition time frame for Reliability Coordinators is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

4. Requirement R7, R8.1, and R8.2 — Do you think the 2 to 6-hour time frame for applicable Transmission Operators and Balancing Authorities is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: 2 hours maximum seems more appropriate.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

5. Requirement R12 — Do you think that implementation or testing operations for a minimum of two hours annually is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: Yes, as a minimum.

6. Requirement R13 — The SDT proposes that within 6 calendar months of having lost its primary control center or backup capability that an entity will have a plan in place for re-establishing backup capability. Is 6 calendar months appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: 6 months seems excessive. It seems within 2 months an entity should at least have a plan.

7. If you are aware of any regional variances that would be required as a result of this standard, or if you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement, please identify them here.

Yes

No

Comments:

8. If you have any other comments on the proposed standard that you haven't already provided in response to the questions above, please provide them here.

Yes

No

Comments: R9.1 "...within sixty calendar days of any changes to the backup location, capabilities, or communication protocols." is wide open. It seems there could be changes made that improve capabilities or communication protocols that would not meet the threshold of a revision to the plan, such as a tool added to the primary center that works similarly at the Backup Center. The words "any changes" are too broad, possibly replace with "significant changes that impact the Operating Plan....." or similar.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Please use this form to submit comments on the 1st draft of the standards for Backup Facilities (Project 2006-04). Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "BF Standards" in the subject line. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

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

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

Group Name: NPCC Regional Standards Committee

Lead Contact: Mr. Guy Zito

Contact Organization: NPCC

Contact Segment: Regional Standards

Contact Telephone: 212-840-1070

Contact E-mail: Gzito@npcc.org

Additional Member Name	Additional Member Organization	Region*	Segment*
Guy Zito	NPCC	NPCC	10
Lee Pedowicz	NPCC	NPCC	10
Brian Evans-Mongeon	Utility Services, LLC	NPCC	6
Randy MacDonald	New Brunswick System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1, 2
Ronald Hart	Dominion Resources, Inc.	NPCC	5
Biju Gopi	Independent Electricity System Operator	NPCC	2
Murale Gopinathan	Northeast Utilities	NPCC	1, 4
Michael Ranalli	National Grid	NPCC	1, 4
Kathleen Goodman	ISO New England	NPCC	2
Ralph Rufrano	New York Power Authority	NPCC	1, 4, 5, 6, 9
Peter Yost	Consolidated Edison Company of New York, Inc.	NPCC	1, 4, 5, 6
Roger Champagne	Hydro-Quebec TransEnergie	NPCC	1, 2
Gregory Campoli	New York Independent System Operator	NPCC	2
Brian Gooder	Ontario Power Generation Incorporated	NPCC	5
Donald Nelson	Massachusetts Department of Public Utilities	NPCC	9
David Kiguel	Hydro One Networks	NPCC	1, 3

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

Background Information

The Backup Facilities Standard Drafting Team (SDT) is submitting these questions as part of its initial effort in revising EOP-008. Extensive revisions have been made to the existing standard. Many of these changes are a direct result of comments received from industry and from FERC Order 693.

The SDT is attempting to come up with practical limits as to which Transmission Operators (TOPs) need to be covered by this standard. This is to avoid placing undue burdens on small entities that would not have a deleterious effect on the reliability of the Interconnection. In that same vein, the SDT is allowing TOPs and BAs to provide needed backup functionality through third-party contract services. Again, this is an effort to reduce the burden on these entities without adversely impacting reliability.

The SDT has not included the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard. This position is in conflict with a directive in FERC Order 693. The SDT has discussed this issue at length and has been unable to come up with a reliability-based reason for centrally dispatched GOP inclusion. However, this position will need to be defended at FERC when this standard is filed. Along those lines, the SDT is working on a position paper outlining the reasons for this approach. A specific question has been included on this topic with a direct request for inputs from GOPs. In general, the SDT must provide an alternative approach that presents an equally effective and efficient solution to the one proposed in FERC Order 693. This could include items such as suggesting strengthening other standards, presenting business practices that may be followed now that would preclude the need for a backup control center, lesser cost alternatives, etc.

The SDT has also established timeframes for when backup capability must be available. These time frames are different for Reliability Coordinators (RCs) versus TOPs and BAs. Specific questions asking for feedback on these times have been included below. In addition, questions related to times involved for testing and re-establishment of primary/backup capability have been raised.

The Backup Facilities Standard Drafting Team would like to receive industry comments on this revised standard. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "BF Standards" by **March 7, 2008**.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

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

1. The SDT has attempted to limit the applicability provisions for Transmission Operators in this standard. Do you agree with this limitation? If not, please provide the reasons and alternatives.

Yes

No

Comments:

2. The SDT has decided not to include the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard at this time. The SDT believes that there are other equally efficient and effective methods for the GOPs to continue to fulfill their role in preserving the reliability of the Interconnection following the loss of its control center. This position is contrary to a directive in FERC Order 693. The SDT will need to provide specific reasoning to FERC for adopting such an approach and is therefore, soliciting opinions from the industry. Do you agree with this approach? If not, please state the reasons and suggest an alternative. The SDT is particularly interested in receiving inputs from GOPs as to how they currently handle such a situation.

Yes

No

Comments: The applicability of this standard should be restricted to RC, BA, and TOP functions. The GOP's functions is to follow the directions of the BA for demand-energy balance and to ensure that applicable standards are complied to. It is essential that the BA, TOP, and RC have back-up facilities or provisions as specified in this standard but the GOP need not be included as long as the BA ensures that all BA functions are addressed by its back-up facilities.

However, it is important that GOPs have a backup communication plan in place which must be provided to the appropriate reliability entity upon request.

3. Requirement R6 — Do you think that the 2-hour transition time frame for Reliability Coordinators is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

R6 needs additional "sub-bullet" to address what happens if the two hour time limit on the RC implementation of the backup plan is exceeded, similar to R8.1.

It is not the transition time that is in focus here but the system reliability issues which could come up during the transition period which needs to be looked at closely.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

4. Requirement R7, R8.1, and R8.2 — Do you think the 2 to 6-hour time frame for applicable Transmission Operators and Balancing Authorities is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: NPCC participating members believe that bullets 8.1 and 8.2 are not related to requirement 8, perhaps these should be relocated to requirement 7.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

5. Requirement R12 — Do you think that implementation or testing operations for a minimum of two hours annually is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: It is a minimum

6. Requirement R13 — The SDT proposes that within 6 calendar months of having lost its primary control center or backup capability that an entity will have a plan in place for re-establishing backup capability. Is 6 calendar months appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: NPCC participating members suggest the drafting team provide for a compliance exemption should the primary or back up control center be lost because of a catastrophic failure.

7. If you are aware of any regional variances that would be required as a result of this standard, or if you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement, please identify them here.

Yes

No

Comments:

8. If you have any other comments on the proposed standard that you haven't already provided in response to the questions above, please provide them here.

Yes

No

Comments:

Drafting team should clarify the term "GOP centrally dispatched".

The Drafting Team should focus on the reliability objective as opposed to how the objective is met.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Please use this form to submit comments on the 1st draft of the standards for Backup Facilities (Project 2006-04). Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "BF Standards" in the subject line. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Stan Southers / Ellis Rankin
Organization:	Oncor Electric Delivery Company LLC
Telephone:	214-486-2084 / 214-743-6825
E-mail:	stan.southers@oncor.com / erankin@oncor.com
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input checked="" type="checkbox"/> ERCOT	<input checked="" type="checkbox"/> 1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/> 2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/> 3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/> 4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/> 5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/> 6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/> 7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/> 8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/> 9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/> 10 — Regional Reliability Organizations and Regional Entities

Background Information

The Backup Facilities Standard Drafting Team (SDT) is submitting these questions as part of its initial effort in revising EOP-008. Extensive revisions have been made to the existing standard. Many of these changes are a direct result of comments received from industry and from FERC Order 693.

The SDT is attempting to come up with practical limits as to which Transmission Operators (TOPs) need to be covered by this standard. This is to avoid placing undue burdens on small entities that would not have a deleterious effect on the reliability of the Interconnection. In that same vein, the SDT is allowing TOPs and BAs to provide needed backup functionality through third-party contract services. Again, this is an effort to reduce the burden on these entities without adversely impacting reliability.

The SDT has not included the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard. This position is in conflict with a directive in FERC Order 693. The SDT has discussed this issue at length and has been unable to come up with a reliability-based reason for centrally dispatched GOP inclusion. However, this position will need to be defended at FERC when this standard is filed. Along those lines, the SDT is working on a position paper outlining the reasons for this approach. A specific question has been included on this topic with a direct request for inputs from GOPs. In general, the SDT must provide an alternative approach that presents an equally effective and efficient solution to the one proposed in FERC Order 693. This could include items such as suggesting strengthening other standards, presenting business practices that may be followed now that would preclude the need for a backup control center, lesser cost alternatives, etc.

The SDT has also established timeframes for when backup capability must be available. These time frames are different for Reliability Coordinators (RCs) versus TOPs and BAs. Specific questions asking for feedback on these times have been included below. In addition, questions related to times involved for testing and re-establishment of primary/backup capability have been raised.

The Backup Facilities Standard Drafting Team would like to receive industry comments on this revised standard. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "BF Standards" by **March 7, 2008**.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

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

1. The SDT has attempted to limit the applicability provisions for Transmission Operators in this standard. Do you agree with this limitation? If not, please provide the reasons and alternatives.

Yes

No

Comments:

2. The SDT has decided not to include the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard at this time. The SDT believes that there are other equally efficient and effective methods for the GOPs to continue to fulfill their role in preserving the reliability of the Interconnection following the loss of its control center. This position is contrary to a directive in FERC Order 693. The SDT will need to provide specific reasoning to FERC for adopting such an approach and is therefore, soliciting opinions from the industry. Do you agree with this approach? If not, please state the reasons and suggest an alternative. The SDT is particularly interested in receiving inputs from GOPs as to how they currently handle such a situation.

Yes

No

Comments:

3. Requirement R6 — Do you think that the 2-hour transition time frame for Reliability Coordinators is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

4. Requirement R7, R8.1, and R8.2 — Do you think the 2 to 6-hour time frame for applicable Transmission Operators and Balancing Authorities is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

5. Requirement R12 — Do you think that implementation or testing operations for a minimum of two hours annually is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

6. Requirement R13 — The SDT proposes that within 6 calendar months of having lost its primary control center or backup capability that an entity will have a plan in place for re-establishing backup capability. Is 6 calendar months appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

7. If you are aware of any regional variances that would be required as a result of this standard, or if you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement, please identify them here.

Yes

No

Comments:

8. If you have any other comments on the proposed standard that you haven't already provided in response to the questions above, please provide them here.

Yes

No

Comments: Requirement R3 is a step in the right direction. The intent is to be sure that local control centers that provide significant BES operating activities but which are not TOPs themselves also have backup capability. The requirement as written is subject to significant interpretation and it isn't clear whether the requirement achieves the desired outcome. For example, one interpretation would be that the TOP backup plan has to consider being able to operate with the local control center through its backup plan, but a more robust interpretation would address whether the backup facility plan of the TOP has also taken care of the loss of the primary control center for the local control center. This issue would typically arise when a Transmission Owner operates a primary control center that is important to BES reliability, but which is not themselves a Transmission Operator. The direct method would be to make these Transmission Owners a responsible entity. However, if the intent is to get to this concern through the Transmission Operator, then additional clarity in R3 is necessary.

A very important issue that must be dealt with in this standard is the issue of enforcement of this standard following loss of the primary control center. There are two distinct dimensions to this issue. One is that during the transition period from the primary facility to the backup capability it needs to be recognized that not all reliability functions will be able to be accomplished. Specific waiver from compliance is very important during this transition period. Unless such a waiver is provided, the standard will essentially require that zero transition time is allowed between loss of primary

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

control center and full functionality of backup capability. Such a requirement would essentially require a fully staffed hot backup capability at all times. Oncor believes such a requirement will be too expensive and not warranted. A second dimension to this compliance concern follows the loss of the primary control center itself. After the backup capability is fully functioning, compliance with all reliability standards would be expected, but the concern is whether compliance with EOP-008 itself would still be required. Unless it is clear that the provision of a backup capability is not required during the period that the primary capability has been lost, the result will be that a backup to the backup capability must be provided at all times. Oncor strongly believes that there is no credible reliability argument that would indicate that such a 3 deep backup capability is warranted, and without such a waiver the standard would impose unreasonable costs on the industry.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Please use this form to submit comments on the 1st draft of the standards for Backup Facilities (Project 2006-04). Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "BF Standards" in the subject line. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Robert Williams	
Organization:	PacifiCorp Grid Operations	
Telephone:	(503) 251-5197	
E-mail:	robert_l.williams@pacificorp.com	
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input checked="" type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background Information

The Backup Facilities Standard Drafting Team (SDT) is submitting these questions as part of its initial effort in revising EOP-008. Extensive revisions have been made to the existing standard. Many of these changes are a direct result of comments received from industry and from FERC Order 693.

The SDT is attempting to come up with practical limits as to which Transmission Operators (TOPs) need to be covered by this standard. This is to avoid placing undue burdens on small entities that would not have a deleterious effect on the reliability of the Interconnection. In that same vein, the SDT is allowing TOPs and BAs to provide needed backup functionality through third-party contract services. Again, this is an effort to reduce the burden on these entities without adversely impacting reliability.

The SDT has not included the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard. This position is in conflict with a directive in FERC Order 693. The SDT has discussed this issue at length and has been unable to come up with a reliability-based reason for centrally dispatched GOP inclusion. However, this position will need to be defended at FERC when this standard is filed. Along those lines, the SDT is working on a position paper outlining the reasons for this approach. A specific question has been included on this topic with a direct request for inputs from GOPs. In general, the SDT must provide an alternative approach that presents an equally effective and efficient solution to the one proposed in FERC Order 693. This could include items such as suggesting strengthening other standards, presenting business practices that may be followed now that would preclude the need for a backup control center, lesser cost alternatives, etc.

The SDT has also established timeframes for when backup capability must be available. These time frames are different for Reliability Coordinators (RCs) versus TOPs and BAs. Specific questions asking for feedback on these times have been included below. In addition, questions related to times involved for testing and re-establishment of primary/backup capability have been raised.

The Backup Facilities Standard Drafting Team would like to receive industry comments on this revised standard. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "BF Standards" by **March 7, 2008**.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

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

1. The SDT has attempted to limit the applicability provisions for Transmission Operators in this standard. Do you agree with this limitation? If not, please provide the reasons and alternatives.

Yes

No

Comments:

2. The SDT has decided not to include the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard at this time. The SDT believes that there are other equally efficient and effective methods for the GOPs to continue to fulfill their role in preserving the reliability of the Interconnection following the loss of its control center. This position is contrary to a directive in FERC Order 693. The SDT will need to provide specific reasoning to FERC for adopting such an approach and is therefore, soliciting opinions from the industry. Do you agree with this approach? If not, please state the reasons and suggest an alternative. The SDT is particularly interested in receiving inputs from GOPs as to how they currently handle such a situation.

Yes

No

Comments:

3. Requirement R6 — Do you think that the 2-hour transition time frame for Reliability Coordinators is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

4. Requirement R7, R8.1, and R8.2 — Do you think the 2 to 6-hour time frame for applicable Transmission Operators and Balancing Authorities is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

5. Requirement R12 — Do you think that implementation or testing operations for a minimum of two hours annually is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

6. Requirement R13 — The SDT proposes that within 6 calendar months of having lost its primary control center or backup capability that an entity will have a plan in place for re-establishing backup capability. Is 6 calendar months appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: If the site for the backup facility must be completely reconstructed, it may not be feasible for it to be re-established within 6 calendar months. 6 months to a year would be more appropriate, allowing room to relocate and re-establish, if necessary.

7. If you are aware of any regional variances that would be required as a result of this standard, or if you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement, please identify them here.

Yes

No

Comments:

8. If you have any other comments on the proposed standard that you haven't already provided in response to the questions above, please provide them here.

Yes

No

Comments:

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Please use this form to submit comments on the 1st draft of the standards for Backup Facilities (Project 2006-04). Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "BF Standards" in the subject line. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Lauri Jones	
Organization:	Pacific Gas and Electric Company	
Telephone:	415-973-0918	
E-mail:	llj8@pge.com	
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input checked="" type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background Information

The Backup Facilities Standard Drafting Team (SDT) is submitting these questions as part of its initial effort in revising EOP-008. Extensive revisions have been made to the existing standard. Many of these changes are a direct result of comments received from industry and from FERC Order 693.

The SDT is attempting to come up with practical limits as to which Transmission Operators (TOPs) need to be covered by this standard. This is to avoid placing undue burdens on small entities that would not have a deleterious effect on the reliability of the Interconnection. In that same vein, the SDT is allowing TOPs and BAs to provide needed backup functionality through third-party contract services. Again, this is an effort to reduce the burden on these entities without adversely impacting reliability.

The SDT has not included the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard. This position is in conflict with a directive in FERC Order 693. The SDT has discussed this issue at length and has been unable to come up with a reliability-based reason for centrally dispatched GOP inclusion. However, this position will need to be defended at FERC when this standard is filed. Along those lines, the SDT is working on a position paper outlining the reasons for this approach. A specific question has been included on this topic with a direct request for inputs from GOPs. In general, the SDT must provide an alternative approach that presents an equally effective and efficient solution to the one proposed in FERC Order 693. This could include items such as suggesting strengthening other standards, presenting business practices that may be followed now that would preclude the need for a backup control center, lesser cost alternatives, etc.

The SDT has also established timeframes for when backup capability must be available. These time frames are different for Reliability Coordinators (RCs) versus TOPs and BAs. Specific questions asking for feedback on these times have been included below. In addition, questions related to times involved for testing and re-establishment of primary/backup capability have been raised.

The Backup Facilities Standard Drafting Team would like to receive industry comments on this revised standard. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "BF Standards" by **March 7, 2008**.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

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

1. The SDT has attempted to limit the applicability provisions for Transmission Operators in this standard. Do you agree with this limitation? If not, please provide the reasons and alternatives.

Yes

No

Comments:

2. The SDT has decided not to include the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard at this time. The SDT believes that there are other equally efficient and effective methods for the GOPs to continue to fulfill their role in preserving the reliability of the Interconnection following the loss of its control center. This position is contrary to a directive in FERC Order 693. The SDT will need to provide specific reasoning to FERC for adopting such an approach and is therefore, soliciting opinions from the industry. Do you agree with this approach? If not, please state the reasons and suggest an alternative. The SDT is particularly interested in receiving inputs from GOPs as to how they currently handle such a situation.

Yes

No

Comments: It is our understanding that the drafting teams are given specific direction in following the FERC Order 693 directive. If this approach had been followed then the team would respond to industry comments during the comment review period. This approach will further delay the standard implementation period.

3. Requirement R6 — Do you think that the 2-hour transition time frame for Reliability Coordinators is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

4. Requirement R7, R8.1, and R8.2 — Do you think the 2 to 6-hour time frame for applicable Transmission Operators and Balancing Authorities is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

5. Requirement R12 — Do you think that implementation or testing operations for a minimum of two hours annually is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: It is also unclear as to who will be testing it? Are the Operating Plans for the functionality to be tested for the two hours annually, ment for each operator or is it only for that control center, once per year?

6. Requirement R13 — The SDT proposes that within 6 calendar months of having lost its primary control center or backup capability that an entity will have a plan in place for re-establishing backup capability. Is 6 calendar months appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

7. If you are aware of any regional variances that would be required as a result of this standard, or if you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement, please identify them here.

Yes

No

Comments:

8. If you have any other comments on the proposed standard that you haven't already provided in response to the questions above, please provide them here.

Yes

No

Comments:

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Please use this form to submit comments on the 1st draft of the standards for Backup Facilities (Project 2006-04). Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "BF Standards" in the subject line. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

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

Background Information

The Backup Facilities Standard Drafting Team (SDT) is submitting these questions as part of its initial effort in revising EOP-008. Extensive revisions have been made to the existing standard. Many of these changes are a direct result of comments received from industry and from FERC Order 693.

The SDT is attempting to come up with practical limits as to which Transmission Operators (TOPs) need to be covered by this standard. This is to avoid placing undue burdens on small entities that would not have a deleterious effect on the reliability of the Interconnection. In that same vein, the SDT is allowing TOPs and BAs to provide needed backup functionality through third-party contract services. Again, this is an effort to reduce the burden on these entities without adversely impacting reliability.

The SDT has not included the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard. This position is in conflict with a directive in FERC Order 693. The SDT has discussed this issue at length and has been unable to come up with a reliability-based reason for centrally dispatched GOP inclusion. However, this position will need to be defended at FERC when this standard is filed. Along those lines, the SDT is working on a position paper outlining the reasons for this approach. A specific question has been included on this topic with a direct request for inputs from GOPs. In general, the SDT must provide an alternative approach that presents an equally effective and efficient solution to the one proposed in FERC Order 693. This could include items such as suggesting strengthening other standards, presenting business practices that may be followed now that would preclude the need for a backup control center, lesser cost alternatives, etc.

The SDT has also established timeframes for when backup capability must be available. These time frames are different for Reliability Coordinators (RCs) versus TOPs and BAs. Specific questions asking for feedback on these times have been included below. In addition, questions related to times involved for testing and re-establishment of primary/backup capability have been raised.

The Backup Facilities Standard Drafting Team would like to receive industry comments on this revised standard. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "BF Standards" by **March 7, 2008**.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

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

1. The SDT has attempted to limit the applicability provisions for Transmission Operators in this standard. Do you agree with this limitation? If not, please provide the reasons and alternatives.

Yes

No

Comments: According to NERC's Statement of Compliance Registry Criteria (Revision 4.0), any entity responsible for the reliability of its "local" transmission system, and that operates or directs the operations of the transmission facilities, and is directly connected to the bulk power system (>100 kv), is required to register as a TOP. As such, the loss of any TOP's primary control facilities could have a major impact on wider system reliability. Therefore, ALL registered TOPs should be included in this standard.

2. The SDT has decided not to include the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard at this time. The SDT believes that there are other equally efficient and effective methods for the GOPs to continue to fulfill their role in preserving the reliability of the Interconnection following the loss of its control center. This position is contrary to a directive in FERC Order 693. The SDT will need to provide specific reasoning to FERC for adopting such an approach and is therefore, soliciting opinions from the industry. Do you agree with this approach? If not, please state the reasons and suggest an alternative. The SDT is particularly interested in receiving inputs from GOPs as to how they currently handle such a situation.

Yes

No

Comments: Although GOPs should not be required to maintain backup facilities, they should be required to have a backup communications plan under the COM standards.

3. Requirement R6 — Do you think that the 2-hour transition time frame for Reliability Coordinators is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: The current, approved version of EOP-008, R1.8, states "Interim provisions must be included if it is expected to take more than one hour to implement the contingency plan for loss of primary control facility." We believe this time-frame is appropriate and in the best interest of system reliability, and therefore should not be relaxed.

4. Requirement R7, R8.1, and R8.2 — Do you think the 2 to 6-hour time frame for applicable Transmission Operators and Balancing Authorities is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Comments: RC's typically have a limited ability to control generation or transmission facilities. Without the BA and TOP control facilities, the RC will not be able to effectively perform its' functions. Therefore, the BA and TOP entities should be required to meet the same one hour time limit that applies to RCs.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

5. Requirement R12 — Do you think that implementation or testing operations for a minimum of two hours annually is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: The two hour requirement appears to be arbitrary and should not be included in the standard. The standard should state something to the effect that "Each Reliability Coordinator, Balancing Authority and Transmission Operator shall test its Operating Plan for backup functionality through actual implementation or test operations on a semi-annual basis."

6. Requirement R13 — The SDT proposes that within 6 calendar months of having lost its primary control center or backup capability that an entity will have a plan in place for re-establishing backup capability. Is 6 calendar months appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: The structure of the requirement is confusing. We suggest that it be rewritten as "If the Primary or backup functionality is lost then each RC, TOP and BA shall provide a plan to its Regional Entity within six calendar months showing how it will re-establish backup capability"

7. If you are aware of any regional variances that would be required as a result of this standard, or if you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement, please identify them here.

Yes

No

Comments:

8. If you have any other comments on the proposed standard that you haven't already provided in response to the questions above, please provide them here.

Yes

No

Comments: We suggest requirement 8 be rewritten to read;

"For each RC, TOP and BA, the Operating Plan for backup functionality shall include a list of all entities that need to be notified of a change in operating locations."

R8.1 and R8.2 can be eliminated since the time requirements suggested above are the same for BA, TOP, RC.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Please use this form to submit comments on the 1st draft of the standards for Backup Facilities (Project 2006-04). Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "BF Standards" in the subject line. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

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

Background Information

The Backup Facilities Standard Drafting Team (SDT) is submitting these questions as part of its initial effort in revising EOP-008. Extensive revisions have been made to the existing standard. Many of these changes are a direct result of comments received from industry and from FERC Order 693.

The SDT is attempting to come up with practical limits as to which Transmission Operators (TOPs) need to be covered by this standard. This is to avoid placing undue burdens on small entities that would not have a deleterious effect on the reliability of the Interconnection. In that same vein, the SDT is allowing TOPs and BAs to provide needed backup functionality through third-party contract services. Again, this is an effort to reduce the burden on these entities without adversely impacting reliability.

The SDT has not included the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard. This position is in conflict with a directive in FERC Order 693. The SDT has discussed this issue at length and has been unable to come up with a reliability-based reason for centrally dispatched GOP inclusion. However, this position will need to be defended at FERC when this standard is filed. Along those lines, the SDT is working on a position paper outlining the reasons for this approach. A specific question has been included on this topic with a direct request for inputs from GOPs. In general, the SDT must provide an alternative approach that presents an equally effective and efficient solution to the one proposed in FERC Order 693. This could include items such as suggesting strengthening other standards, presenting business practices that may be followed now that would preclude the need for a backup control center, lesser cost alternatives, etc.

The SDT has also established timeframes for when backup capability must be available. These time frames are different for Reliability Coordinators (RCs) versus TOPs and BAs. Specific questions asking for feedback on these times have been included below. In addition, questions related to times involved for testing and re-establishment of primary/backup capability have been raised.

The Backup Facilities Standard Drafting Team would like to receive industry comments on this revised standard. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "BF Standards" by **March 7, 2008**.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

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

1. The SDT has attempted to limit the applicability provisions for Transmission Operators in this standard. Do you agree with this limitation? If not, please provide the reasons and alternatives.

Yes

No

Comments:

2. The SDT has decided not to include the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard at this time. The SDT believes that there are other equally efficient and effective methods for the GOPs to continue to fulfill their role in preserving the reliability of the Interconnection following the loss of its control center. This position is contrary to a directive in FERC Order 693. The SDT will need to provide specific reasoning to FERC for adopting such an approach and is therefore, soliciting opinions from the industry. Do you agree with this approach? If not, please state the reasons and suggest an alternative. The SDT is particularly interested in receiving inputs from GOPs as to how they currently handle such a situation.

Yes

No

Comments:

3. Requirement R6 — Do you think that the 2-hour transition time frame for Reliability Coordinators is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

4. Requirement R7, R8.1, and R8.2 — Do you think the 2 to 6-hour time frame for applicable Transmission Operators and Balancing Authorities is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

5. Requirement R12 — Do you think that implementation or testing operations for a minimum of two hours annually is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

6. Requirement R13 — The SDT proposes that within 6 calendar months of having lost its primary control center or backup capability that an entity will have a plan in place for re-establishing backup capability. Is 6 calendar months appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

7. If you are aware of any regional variances that would be required as a result of this standard, or if you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement, please identify them here.

Yes

No

Comments:

8. If you have any other comments on the proposed standard that you haven't already provided in response to the questions above, please provide them here.

Yes

No

Comments:

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Please use this form to submit comments on the 1st draft of the standards for Backup Facilities (Project 2006-04). Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "BF Standards" in the subject line. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Mark Willis	
Organization:	SMUD	
Telephone:	(916) 732-5451	
E-mail:	mwillis@smud.org	
NERC Region (check all Regions in which your company operates)	<input type="checkbox"/>	Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input checked="" type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input checked="" type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input checked="" type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background Information

The Backup Facilities Standard Drafting Team (SDT) is submitting these questions as part of its initial effort in revising EOP-008. Extensive revisions have been made to the existing standard. Many of these changes are a direct result of comments received from industry and from FERC Order 693.

The SDT is attempting to come up with practical limits as to which Transmission Operators (TOPs) need to be covered by this standard. This is to avoid placing undue burdens on small entities that would not have a deleterious effect on the reliability of the Interconnection. In that same vein, the SDT is allowing TOPs and BAs to provide needed backup functionality through third-party contract services. Again, this is an effort to reduce the burden on these entities without adversely impacting reliability.

The SDT has not included the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard. This position is in conflict with a directive in FERC Order 693. The SDT has discussed this issue at length and has been unable to come up with a reliability-based reason for centrally dispatched GOP inclusion. However, this position will need to be defended at FERC when this standard is filed. Along those lines, the SDT is working on a position paper outlining the reasons for this approach. A specific question has been included on this topic with a direct request for inputs from GOPs. In general, the SDT must provide an alternative approach that presents an equally effective and efficient solution to the one proposed in FERC Order 693. This could include items such as suggesting strengthening other standards, presenting business practices that may be followed now that would preclude the need for a backup control center, lesser cost alternatives, etc.

The SDT has also established timeframes for when backup capability must be available. These time frames are different for Reliability Coordinators (RCs) versus TOPs and BAs. Specific questions asking for feedback on these times have been included below. In addition, questions related to times involved for testing and re-establishment of primary/backup capability have been raised.

The Backup Facilities Standard Drafting Team would like to receive industry comments on this revised standard. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "BF Standards" by **March 7, 2008**.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

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

1. The SDT has attempted to limit the applicability provisions for Transmission Operators in this standard. Do you agree with this limitation? If not, please provide the reasons and alternatives.

Yes

No

Comments: All BES entities registered as TOPs should have the same requirements.

2. The SDT has decided not to include the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard at this time. The SDT believes that there are other equally efficient and effective methods for the GOPs to continue to fulfill their role in preserving the reliability of the Interconnection following the loss of its control center. This position is contrary to a directive in FERC Order 693. The SDT will need to provide specific reasoning to FERC for adopting such an approach and is therefore, soliciting opinions from the industry. Do you agree with this approach? If not, please state the reasons and suggest an alternative. The SDT is particularly interested in receiving inputs from GOPs as to how they currently handle such a situation.

Yes

No

Comments: The Centrally controlled GOPs have to have a plan to operate if they lose their central control center. The impact to the BES could be the same as for a TOP.

3. Requirement R6 — Do you think that the 2-hour transition time frame for Reliability Coordinators is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: In the role of the RC, a 2-hour period is insufficient for required reliability coverage, and should be 1-hour.

4. Requirement R7, R8.1, and R8.2 — Do you think the 2 to 6-hour time frame for applicable Transmission Operators and Balancing Authorities is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: In the role of a BA or TOP, a 2 to 6-hour time frame is insufficient for required reliable operation of the BES, and should be no greater than 2-hours.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

5. Requirement R12 — Do you think that implementation or testing operations for a minimum of two hours annually is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: To ensure familiarity with an entity's BCC, a minimum of two weeks (14 days) should be required to ensure all operator crews have the necessary experience.

6. Requirement R13 — The SDT proposes that within 6 calendar months of having lost its primary control center or backup capability that an entity will have a plan in place for re-establishing backup capability. Is 6 calendar months appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: 2 years would be more appropriate to re-establish either a PCC or BCC.

7. If you are aware of any regional variances that would be required as a result of this standard, or if you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement, please identify them here.

Yes

No

Comments: Not aware of any at this time.

8. If you have any other comments on the proposed standard that you haven't already provided in response to the questions above, please provide them here.

Yes

No

Comments: No other comments at this time.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Please use this form to submit comments on the 1st draft of the standards for Backup Facilities (Project 2006-04). Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "BF Standards" in the subject line. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

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

Background Information

The Backup Facilities Standard Drafting Team (SDT) is submitting these questions as part of its initial effort in revising EOP-008. Extensive revisions have been made to the existing standard. Many of these changes are a direct result of comments received from industry and from FERC Order 693.

The SDT is attempting to come up with practical limits as to which Transmission Operators (TOPs) need to be covered by this standard. This is to avoid placing undue burdens on small entities that would not have a deleterious effect on the reliability of the Interconnection. In that same vein, the SDT is allowing TOPs and BAs to provide needed backup functionality through third-party contract services. Again, this is an effort to reduce the burden on these entities without adversely impacting reliability.

The SDT has not included the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard. This position is in conflict with a directive in FERC Order 693. The SDT has discussed this issue at length and has been unable to come up with a reliability-based reason for centrally dispatched GOP inclusion. However, this position will need to be defended at FERC when this standard is filed. Along those lines, the SDT is working on a position paper outlining the reasons for this approach. A specific question has been included on this topic with a direct request for inputs from GOPs. In general, the SDT must provide an alternative approach that presents an equally effective and efficient solution to the one proposed in FERC Order 693. This could include items such as suggesting strengthening other standards, presenting business practices that may be followed now that would preclude the need for a backup control center, lesser cost alternatives, etc.

The SDT has also established timeframes for when backup capability must be available. These time frames are different for Reliability Coordinators (RCs) versus TOPs and BAs. Specific questions asking for feedback on these times have been included below. In addition, questions related to times involved for testing and re-establishment of primary/backup capability have been raised.

The Backup Facilities Standard Drafting Team would like to receive industry comments on this revised standard. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "BF Standards" by **March 7, 2008**.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

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

1. The SDT has attempted to limit the applicability provisions for Transmission Operators in this standard. Do you agree with this limitation? If not, please provide the reasons and alternatives.

Yes

No

Comments: While we agree, we also believe that this standard may not be the best place to provide for that limitation. Other processes exist to handle exceptions and there may be a more reasonable way to limit the impact to smaller Transmission Operators (TOPs). This could easily be handled in the rules of registration for TOPs.

2. The SDT has decided not to include the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard at this time. The SDT believes that there are other equally efficient and effective methods for the GOPs to continue to fulfill their role in preserving the reliability of the Interconnection following the loss of its control center. This position is contrary to a directive in FERC Order 693. The SDT will need to provide specific reasoning to FERC for adopting such an approach and is therefore, soliciting opinions from the industry. Do you agree with this approach? If not, please state the reasons and suggest an alternative. The SDT is particularly interested in receiving inputs from GOPs as to how they currently handle such a situation.

Yes

No

Comments: Generator Operators only follow directions issued by Reliability Functions - Reliability Coordinators (RC), Balancing Authorities (BA) and Transmission Operators (TOP). As long as there are no restrictions in the ability to communicate with the GOPs, there should not be an issue.

3. Requirement R6 — Do you think that the 2-hour transition time frame for Reliability Coordinators is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: The key term is "backup functionality". We believe it's quite reasonable and an appropriate time period to have the backup plan implemented and backup functionality in operation.

4. Requirement R7, R8.1, and R8.2 — Do you think the 2 to 6-hour time frame for applicable Transmission Operators and Balancing Authorities is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Comments: To have the backup plan implemented and backup functionality in operation in a two to three hour period is quite reasonable in our opinion. We do believe that it should be at least two hours but perhaps no more than three hours. Smaller entities that need a larger physical separation between control centers will need at least two hours. In most cases, three hours should be the limit.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

5. Requirement R12 — Do you think that implementation or testing operations for a minimum of two hours annually is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: We believe that should be left to the individual company and their corporate procedures. If you require it, it could unnecessarily introduce reliability problems to the real-time system.

6. Requirement R13 — The SDT proposes that within 6 calendar months of having lost its primary control center or backup capability that an entity will have a plan in place for re-establishing backup capability. Is 6 calendar months appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: We believe that 6 months is reasonable for a plan. We do not believe it is reasonable to expect full recovery in 6 months.

7. If you are aware of any regional variances that would be required as a result of this standard, or if you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement, please identify them here.

Yes

No

Comments:

8. If you have any other comments on the proposed standard that you haven't already provided in response to the questions above, please provide them here.

Yes

No

Comments: We are unsure as to the definition of what starts the transition period and what ends the transition period to the backup control center. We believe further detail is required.

Regarding R11 - what is an "indefinite period of time" and what would be a reasonable measure?

Regarding R4 - We believe the term "replicates" should be removed, as this may not be physically possible. Perhaps a distinction between types of functionality required would be more appropriate.

We certainly disagree with any thought process that would require continual staffing of the backup control center. If entities can invoke their backup plan and have backup functionality with two to three hours, this should be sufficient, especially given the odds of the number of times it will be needed.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Please use this form to submit comments on the 1st draft of the standards for Backup Facilities (Project 2006-04). Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "BF Standards" in the subject line. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

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

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

Group Name: SERC OC Standards Review Group (Project 2006-04)

Lead Contact: Jim Case

Contact Organization: Entergy

Contact Segment: 1,3

Contact Telephone: (870) 541-3908

Contact E-mail: jcase@entergy.com

Additional Member Name	Additional Member Organization	Region*	Segment*
Jack Kerr	Dominion Virginia Power	SERC	1
Sam Holeman	Duke Energy - Carolinas	SERC	1,3
Tim Lyons	Owensboro, KY Municipal Utilities	SERC	1,3
Roman Carter	Southern Company	SERC	1,3
Jerry Tang	Municipal Electric Authority of GA	SERC	1,3
John Neagle	Associated Electric Cooperative, Inc	SERC	1,3
Glenn Stephens	Santee cooper	SERC	1,3
Wayne Ahl	Santee Cooper	SERC	1,3
Pat Huntley	SERC Reliability Corporation	SERC	10
John Troha	SERC Reliability Corporation	SERC	10
Larry Rodriguez	Union Power Partners	SERC	5

*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

Background Information

The Backup Facilities Standard Drafting Team (SDT) is submitting these questions as part of its initial effort in revising EOP-008. Extensive revisions have been made to the existing standard. Many of these changes are a direct result of comments received from industry and from FERC Order 693.

The SDT is attempting to come up with practical limits as to which Transmission Operators (TOPs) need to be covered by this standard. This is to avoid placing undue burdens on small entities that would not have a deleterious effect on the reliability of the Interconnection. In that same vein, the SDT is allowing TOPs and BAs to provide needed backup functionality through third-party contract services. Again, this is an effort to reduce the burden on these entities without adversely impacting reliability.

The SDT has not included the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard. This position is in conflict with a directive in FERC Order 693. The SDT has discussed this issue at length and has been unable to come up with a reliability-based reason for centrally dispatched GOP inclusion. However, this position will need to be defended at FERC when this standard is filed. Along those lines, the SDT is working on a position paper outlining the reasons for this approach. A specific question has been included on this topic with a direct request for inputs from GOPs. In general, the SDT must provide an alternative approach that presents an equally effective and efficient solution to the one proposed in FERC Order 693. This could include items such as suggesting strengthening other standards, presenting business practices that may be followed now that would preclude the need for a backup control center, lesser cost alternatives, etc.

The SDT has also established timeframes for when backup capability must be available. These time frames are different for Reliability Coordinators (RCs) versus TOPs and BAs. Specific questions asking for feedback on these times have been included below. In addition, questions related to times involved for testing and re-establishment of primary/backup capability have been raised.

The Backup Facilities Standard Drafting Team would like to receive industry comments on this revised standard. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "BF Standards" by **March 7, 2008**.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

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

1. The SDT has attempted to limit the applicability provisions for Transmission Operators in this standard. Do you agree with this limitation? If not, please provide the reasons and alternatives.

Yes

No

Comments: The SERC Operating Committee Standards Review Group (SOCSRG) believes that requirement 4.1.2, as written, is unenforceable and unmeasurable. There may be a more reasonable way to limit the impact to smaller Transmission Operators (TOPs). This could easily be handled in the rules of registration for TOPs. Alternatively, there is a process to request waivers from NERC standards that could be used to solve this issue.

2. The SDT has decided not to include the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard at this time. The SDT believes that there are other equally efficient and effective methods for the GOPs to continue to fulfill their role in preserving the reliability of the Interconnection following the loss of its control center. This position is contrary to a directive in FERC Order 693. The SDT will need to provide specific reasoning to FERC for adopting such an approach and is therefore, soliciting opinions from the industry. Do you agree with this approach? If not, please state the reasons and suggest an alternative. The SDT is particularly interested in receiving inputs from GOPs as to how they currently handle such a situation.

Yes

No

Comments: The SOCSRG agrees with this approach. Generator Operators only follow directions issued by Reliability Functions - Reliability Coordinators (RC), Balancing Authorities (BA) and Transmission Operators (TOP). The SOCSRG believes that this standard does not need to apply to Generator Operators (GOP) with a central dispatch function as long as there are no gaps in the Reliability Function's ability to communicate with generation assets.

Other reasons for not including GOP's in this standard are:

- 1.) the diverse nature and sheer number of generators, each already required to contribute to system reliability deficiencies (e.g., AVR response), as opposed to having only one Reliability Coordinator control room, for example. Any reliability deficiency caused by the loss of any single GOP control room or plant would simply be "made up" by other GOPs in the area.
- 2.) the various contributions to the Bulk Electric System of each generator must be taken into account. Some generators run when commercially contracted, others provide imbalance and regulation services, some are contracted to be "Must Run" units, yet others provide peaking capabilities. A "One Size Fits All" approach to requiring GOP BUCCs suggests inefficient and ineffective reliability requirements, and
- 3.) the "hands on" nature of large (500+MW) generating plants essentially prevents operation from a remote location

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

3. Requirement R6 — Do you think that the 2-hour transition time frame for Reliability Coordinators is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: The term 'transition period' is ill-defined by the parenthetical expression that follows it. This leaves the SOCSRГ unable to render an opinion. The parenthetical expression included in R6 should be broken out, more precisely defined, and placed in the standard as a measure for R6.

4. Requirement R7, R8.1, and R8.2 — Do you think the 2 to 6-hour time frame for applicable Transmission Operators and Balancing Authorities is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: The SOCSRГ believes R8.1 and R8.2 are not appropriate subrequirements of Requirement 8 since they pertain to required functionality in the transition period while R8 pertains to a requirement for a notification list. The SOCSRГ also believes that all functional entities subject to this standard in its current form should have a two hour transition period. As currently written, R8.1 and R8.2 are essentially unmeasurable.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

5. Requirement R12 — Do you think that implementation or testing operations for a minimum of two hours annually is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: The SOCSRG believes that R12 is more appropriate as a measure for R6 and the number of required hours to test the plan is immaterial to reliability

6. Requirement R13 — The SDT proposes that within 6 calendar months of having lost its primary control center or backup capability that an entity will have a plan in place for re-establishing backup capability. Is 6 calendar months appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: This requirement is construed as attempting to give an entity an automatic waiver from R1 through R12 of this standard, following a catastrophic loss of its primary or backup control center (BUCC) that is a force majeure event. As written, it does not accomplish that goal. For example, what about the scenario where a primary control center is uninhabitable for longer than 2 hours? Is that entity immediately non-compliant for this standard for having no backup for its BUCC?

7. If you are aware of any regional variances that would be required as a result of this standard, or if you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement, please identify them here.

Yes

No

Comments:

8. If you have any other comments on the proposed standard that you haven't already provided in response to the questions above, please provide them here.

Yes

No

Comments: There are no measures for the above requirements - therefore it is difficult to evaluate the impacts of their applicability. For example, the definition of what starts the transition period and what ends the transition period to the backup control center should be included in the standard.

Regarding R11 - what is an "indefinite period of time" and what would be a reasonable measure?

Regarding R4 and R5 - Not all requirements are created equal - some real-time operating requirements are essential to be backed up.

A general comment by the SOCSRG that this standard, taken as a whole, appears to include "how" language. Requirements should be limited to "what" is required. Much of what is included in this standard appears to be "good utility practice" and not reliability requirements and should be stripped from the standard.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Please use this form to submit comments on the 1st draft of the standards for Backup Facilities (Project 2006-04). Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "BF Standards" in the subject line. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Jay Campbell	
Organization:	Sierra Pacific Power Co.	
Telephone:	775-834-3782	
E-mail:	jcampbell@sppc.com	
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input checked="" type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background Information

The Backup Facilities Standard Drafting Team (SDT) is submitting these questions as part of its initial effort in revising EOP-008. Extensive revisions have been made to the existing standard. Many of these changes are a direct result of comments received from industry and from FERC Order 693.

The SDT is attempting to come up with practical limits as to which Transmission Operators (TOPs) need to be covered by this standard. This is to avoid placing undue burdens on small entities that would not have a deleterious effect on the reliability of the Interconnection. In that same vein, the SDT is allowing TOPs and BAs to provide needed backup functionality through third-party contract services. Again, this is an effort to reduce the burden on these entities without adversely impacting reliability.

The SDT has not included the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard. This position is in conflict with a directive in FERC Order 693. The SDT has discussed this issue at length and has been unable to come up with a reliability-based reason for centrally dispatched GOP inclusion. However, this position will need to be defended at FERC when this standard is filed. Along those lines, the SDT is working on a position paper outlining the reasons for this approach. A specific question has been included on this topic with a direct request for inputs from GOPs. In general, the SDT must provide an alternative approach that presents an equally effective and efficient solution to the one proposed in FERC Order 693. This could include items such as suggesting strengthening other standards, presenting business practices that may be followed now that would preclude the need for a backup control center, lesser cost alternatives, etc.

The SDT has also established timeframes for when backup capability must be available. These time frames are different for Reliability Coordinators (RCs) versus TOPs and BAs. Specific questions asking for feedback on these times have been included below. In addition, questions related to times involved for testing and re-establishment of primary/backup capability have been raised.

The Backup Facilities Standard Drafting Team would like to receive industry comments on this revised standard. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "BF Standards" by **March 7, 2008**.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

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

1. The SDT has attempted to limit the applicability provisions for Transmission Operators in this standard. Do you agree with this limitation? If not, please provide the reasons and alternatives.

Yes

No

Comments:

2. The SDT has decided not to include the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard at this time. The SDT believes that there are other equally efficient and effective methods for the GOPs to continue to fulfill their role in preserving the reliability of the Interconnection following the loss of its control center. This position is contrary to a directive in FERC Order 693. The SDT will need to provide specific reasoning to FERC for adopting such an approach and is therefore, soliciting opinions from the industry. Do you agree with this approach? If not, please state the reasons and suggest an alternative. The SDT is particularly interested in receiving inputs from GOPs as to how they currently handle such a situation.

Yes

No

Comments: To exempt GOP is a serious oversight for this standard. Specifically, for those GOP with a "centrally dispatched control center," they may control many stations with thousands of MW. If that central dispatch facility were lost, how is interconnection reliability maintained without a backup control center? It's not.

3. Requirement R6 — Do you think that the 2-hour transition time frame for Reliability Coordinators is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

4. Requirement R7, R8.1, and R8.2 — Do you think the 2 to 6-hour time frame for applicable Transmission Operators and Balancing Authorities is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: By allowing a six hour transition period, the standard basically is saying that a BA's ACE is unimportant for that time period. The old requirement of 1/2 hour should be maintained.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

5. Requirement R12 — Do you think that implementation or testing operations for a minimum of two hours annually is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

6. Requirement R13 — The SDT proposes that within 6 calendar months of having lost its primary control center or backup capability that an entity will have a plan in place for re-establishing backup capability. Is 6 calendar months appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

7. If you are aware of any regional variances that would be required as a result of this standard, or if you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement, please identify them here.

Yes

No

Comments:

8. If you have any other comments on the proposed standard that you haven't already provided in response to the questions above, please provide them here.

Yes

No

Comments:

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Please use this form to submit comments on the 1st draft of the standards for Backup Facilities (Project 2006-04). Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "BF Standards" in the subject line. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Rich Salgo	
Organization:	Sierra Pacific Resources Transmission	
Telephone:	775-834-5874	
E-mail:	rsalgo@sppc.com	
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input checked="" type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background Information

The Backup Facilities Standard Drafting Team (SDT) is submitting these questions as part of its initial effort in revising EOP-008. Extensive revisions have been made to the existing standard. Many of these changes are a direct result of comments received from industry and from FERC Order 693.

The SDT is attempting to come up with practical limits as to which Transmission Operators (TOPs) need to be covered by this standard. This is to avoid placing undue burdens on small entities that would not have a deleterious effect on the reliability of the Interconnection. In that same vein, the SDT is allowing TOPs and BAs to provide needed backup functionality through third-party contract services. Again, this is an effort to reduce the burden on these entities without adversely impacting reliability.

The SDT has not included the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard. This position is in conflict with a directive in FERC Order 693. The SDT has discussed this issue at length and has been unable to come up with a reliability-based reason for centrally dispatched GOP inclusion. However, this position will need to be defended at FERC when this standard is filed. Along those lines, the SDT is working on a position paper outlining the reasons for this approach. A specific question has been included on this topic with a direct request for inputs from GOPs. In general, the SDT must provide an alternative approach that presents an equally effective and efficient solution to the one proposed in FERC Order 693. This could include items such as suggesting strengthening other standards, presenting business practices that may be followed now that would preclude the need for a backup control center, lesser cost alternatives, etc.

The SDT has also established timeframes for when backup capability must be available. These time frames are different for Reliability Coordinators (RCs) versus TOPs and BAs. Specific questions asking for feedback on these times have been included below. In addition, questions related to times involved for testing and re-establishment of primary/backup capability have been raised.

The Backup Facilities Standard Drafting Team would like to receive industry comments on this revised standard. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "BF Standards" by **March 7, 2008**.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

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

1. The SDT has attempted to limit the applicability provisions for Transmission Operators in this standard. Do you agree with this limitation? If not, please provide the reasons and alternatives.

Yes

No

Comments: I agree with the concept of limiting the applicability, but I disagree with the relationship made to "Critical Assets", which I assume are those that are determined pursuant to CIP-002. Given the wide industry debate about CIP Critical Assets, I don't believe this will be a stable enough parameter upon which to base the need for BUCC's. As an alternative, perhaps the restriction should be to "TO's with control of Facilities with defined IROL's or SOL's".

2. The SDT has decided not to include the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard at this time. The SDT believes that there are other equally efficient and effective methods for the GOPs to continue to fulfill their role in preserving the reliability of the Interconnection following the loss of its control center. This position is contrary to a directive in FERC Order 693. The SDT will need to provide specific reasoning to FERC for adopting such an approach and is therefore, soliciting opinions from the industry. Do you agree with this approach? If not, please state the reasons and suggest an alternative. The SDT is particularly interested in receiving inputs from GOPs as to how they currently handle such a situation.

Yes

No

Comments: The suggestion that Generating plants would need to have backup control centers is not financially feasible for the industry. The potential benefit of such a move would be minimal, if any. I'm pleased that the SDT did not pursue that direction.

3. Requirement R6 — Do you think that the 2-hour transition time frame for Reliability Coordinators is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: Most entities target 30-60 minutes as the time frame to start up their backup centers. Allowing two hours is appropriate.

4. Requirement R7, R8.1, and R8.2 — Do you think the 2 to 6-hour time frame for applicable Transmission Operators and Balancing Authorities is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Comments: I don't disagree with 6 hours for BA's and TOP's as a Requirement, although, I believe the industry entities can do much better than this.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

5. Requirement R12 — Do you think that implementation or testing operations for a minimum of two hours annually is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: This is a good idea. Having to operate through 1 or more hourly ramp periods is a reasonable test of functionality.

6. Requirement R13 — The SDT proposes that within 6 calendar months of having lost its primary control center or backup capability that an entity will have a plan in place for re-establishing backup capability. Is 6 calendar months appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

7. If you are aware of any regional variances that would be required as a result of this standard, or if you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement, please identify them here.

Yes

No

Comments: Not aware of any.

8. If you have any other comments on the proposed standard that you haven't already provided in response to the questions above, please provide them here.

Yes

No

Comments:

Use of "Plan", "Process" and "Procedure": I found myself a bit confused as to the terminology used here. The Standard starts out by defining that there shall be an Operating Plan for the backup center, which is to include a number of items. Later, the Standard introduces the terms "Operating Process" (R1.4 and R1.5) and even "Operating Procedure" (R8.1, R8.2). Many will interpret these terms to be synonymous unless there is some distinction provided in the Standard.

R9 Annual Review and Approval by a "manager": This term seemed a bit loose to me as I reviewed the Standard. As it is not a defined term, it is left open to interpretation as to what level individual can act as the "manager". Perhaps there should be some clarification such as "...a manager having functional responsibility for Control Center Operation".

R10 Dependency Upon Primary Control Center: This Requirement prohibits any dependency upon the primary center for any aspect of the backup center operation. Such a strict Requirement may necessitate a transition period to achieve compliance. Most BUCC operations have some level of dependency upon the primary, and we strive to minimize that. The BUCC will likely have a reduced, but adequate, level of functionality if the primary were to be completely destroyed, but might have far greater

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

capability if some of the primary control center facilities remain active. Note that this Standard does not specifically prescribe how much visibility or functionality the BUCC must have.

Document Simplification Suggestions: Since R1 describes the Operating Plan and its minimum included items, I would suggest moving the text of R8 into a sub-item of R1, as R1.7. The draft R8 talks about another item that is to be included in the Operating Plan.

The sub items R8.1 and R8.2 don't seem to bear any relationship to the parent R8. These Requirements are for situational awareness if the implementation of the BUCC operation is to last more than 2 hours, and they fit better as sub-items under R7, which speaks to the transition period. I'd therefore suggest moving these under R7 as R7.1 and R7.2.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Please use this form to submit comments on the 1st draft of the standards for Backup Facilities (Project 2006-04). Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "BF Standards" in the subject line. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

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

Background Information

The Backup Facilities Standard Drafting Team (SDT) is submitting these questions as part of its initial effort in revising EOP-008. Extensive revisions have been made to the existing standard. Many of these changes are a direct result of comments received from industry and from FERC Order 693.

The SDT is attempting to come up with practical limits as to which Transmission Operators (TOPs) need to be covered by this standard. This is to avoid placing undue burdens on small entities that would not have a deleterious effect on the reliability of the Interconnection. In that same vein, the SDT is allowing TOPs and BAs to provide needed backup functionality through third-party contract services. Again, this is an effort to reduce the burden on these entities without adversely impacting reliability.

The SDT has not included the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard. This position is in conflict with a directive in FERC Order 693. The SDT has discussed this issue at length and has been unable to come up with a reliability-based reason for centrally dispatched GOP inclusion. However, this position will need to be defended at FERC when this standard is filed. Along those lines, the SDT is working on a position paper outlining the reasons for this approach. A specific question has been included on this topic with a direct request for inputs from GOPs. In general, the SDT must provide an alternative approach that presents an equally effective and efficient solution to the one proposed in FERC Order 693. This could include items such as suggesting strengthening other standards, presenting business practices that may be followed now that would preclude the need for a backup control center, lesser cost alternatives, etc.

The SDT has also established timeframes for when backup capability must be available. These time frames are different for Reliability Coordinators (RCs) versus TOPs and BAs. Specific questions asking for feedback on these times have been included below. In addition, questions related to times involved for testing and re-establishment of primary/backup capability have been raised.

The Backup Facilities Standard Drafting Team would like to receive industry comments on this revised standard. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "BF Standards" by **March 7, 2008**.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

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

1. The SDT has attempted to limit the applicability provisions for Transmission Operators in this standard. Do you agree with this limitation? If not, please provide the reasons and alternatives.

Yes

No

Comments: Southern Company: Southern believes that requirement 4.1.2, as written, is unenforceable and unmeasurable. A more reasonable way to limit the impact to smaller Transmission Operators (TOPs) might be for them to request a waiver to the standard through NERC's waiver process.

Southeastern RC comment: Without the TOP and BA, the function of the RC ceases to exist. All physical control of the Bulk Electric System ceases to exist without a TOP or BA in place. The RC does not have physical controls of the grid. The TOP and BA can function and maintain reliability without the existence of a RC.

2. The SDT has decided not to include the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard at this time. The SDT believes that there are other equally efficient and effective methods for the GOPs to continue to fulfill their role in preserving the reliability of the Interconnection following the loss of its control center. This position is contrary to a directive in FERC Order 693. The SDT will need to provide specific reasoning to FERC for adopting such an approach and is therefore, soliciting opinions from the industry. Do you agree with this approach? If not, please state the reasons and suggest an alternative. The SDT is particularly interested in receiving inputs from GOPs as to how they currently handle such a situation.

Yes

No

Comments: Southern Company: We agree with this approach. Generator Operators only follow directions issued by Reliability Functions - Reliability Coordinators (RC), Balancing Authorities (BA) and Transmission Operators (TOP). The SOCSRG believes that this standard does not need to apply to Generator Operators (GOP) with a central dispatch function.

Southeastern RC comment: With a GOP having a centrally located dispatch control center, all control of the generators are at one location. With the loss of this center and no backup facilities, the BA could not meet standards nor maintain reliability as the pure BA does not have physical control of the generators.

3. Requirement R6 — Do you think that the 2-hour transition time frame for Reliability Coordinators is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Comments: Southern Company: The term "transition period" in the parenthetical is not sufficiently defined and could possibly leave the reader with an ambiguous meaning. The parenthetical expression included in R6 should be broken out and placed in the standard.

Southeastern RC comment: Agrees with this.

4. Requirement R7, R8.1, and R8.2 — Do you think the 2 to 6-hour time frame for applicable Transmission Operators and Balancing Authorities is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: Southern Company: We believe R8.1 and R8.2 are not appropriate subrequirements of Requirement 8 because the subject matter in 8.1 and 8.2 differ from the content contained in 8. Southern believes that all functional entities subject to this standard in its current form should have a two hour transition period. R8.1 and R8.2 are essentially unmeasurable.

Southeastern RC comment: Same answer as 1 (Without the TOP and BA, the function of the RC ceases to exist. All physical control of the Bulk Electric System ceases to exist without a TOP or BA in place. The RC does not have physical controls of the grid. The TOP and BA can function and maintain reliability without the existence of a RC)

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

5. Requirement R12 — Do you think that implementation or testing operations for a minimum of two hours annually is appropriate? If not, please state the reasons and suggest an alternative.

- Yes
 No

Comments: Southern Company: Southern believes that R12 is more appropriate as a measure for R6 and the number of required hours to test the plan is immaterial to reliability. There seems to be an emphasis on "two hours" here. The real emphasis should be on each applicable entity performing an adequate test of their backup facility.

Southeastern RC comment: Agrees with this.

6. Requirement R13 — The SDT proposes that within 6 calendar months of having lost its primary control center or backup capability that an entity will have a plan in place for re-establishing backup capability. Is 6 calendar months appropriate? If not, please state the reasons and suggest an alternative.

- Yes
 No

Comments: Southern Company: This requirement can be interpreted as attempting to give an applicable entity an automatic waiver from R1 through R12 following a catastrophic loss of its primary or backup control center (BUCC) under a force majeure event. As written, it does not accomplish that goal. For example, what about the scenario where a primary control center is uninhabitable for longer than 2 hours? Is that entity immediately non compliant for this standard for having no backup for its BUCC?

Southeastern RC comment: The answer is no, because the moment the primary center is lost, the RC, BA or TOP are out of Compliance. Thus to meet compliance, an entity would be required to have one primary and two backup centers. A lot of detail is lost in this requirement. It should state upon the loss of the primary center the RC, BA, or TOP are exempt from six (6) until a plan can be developed for an additional backup facility. The plan should include a backup center.

7. If you are aware of any regional variances that would be required as a result of this standard, or if you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement, please identify them here.

- Yes
 No

Comments:

8. If you have any other comments on the proposed standard that you haven't already provided in response to the questions above, please provide them here.

- Yes
 No

Comments: Southern Company: There are no measures for the above requirements - therefore it is difficult to evaluate the impacts of their applicability. For example, the

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

definition of what starts the transition period and what ends the transition period to the backup control center should be made more clear in the standard.

Regarding R11 - what is an "indefinite period of time" and what would be a reasonable measure?

Regarding R4 and R5 - Not all requirements are created equal - some real-time operating requirements are essential to be backed up.

Southern Company EMS Services: We have concerns where an entity's current EMS system would not be compliant with the proposed standard, there should be adequate lead time for entities to make changes to their infrastructure to become compliant. Therefore, we would recommend an implementation plan to be a minimum of 2-3 years for this to occur.

How does this standard address computer infrastructure which can be geographically separate from the control centers and backup facilities?

If and when an event occurs, and one of the redundant sites is lost, what is the impact to compliance?

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Please use this form to submit comments on the 1st draft of the standards for Backup Facilities (Project 2006-04). Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "BF Standards" in the subject line. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Operating Reliability Working Group (ORWG)	
Organization:	Southwest Power Pool	
Telephone:	501-614-3241	
E-mail:	rrhodes@spp.org	
NERC Region (check all Regions in which your company operates)	<input type="checkbox"/>	Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input checked="" type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input checked="" type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background Information

The Backup Facilities Standard Drafting Team (SDT) is submitting these questions as part of its initial effort in revising EOP-008. Extensive revisions have been made to the existing standard. Many of these changes are a direct result of comments received from industry and from FERC Order 693.

The SDT is attempting to come up with practical limits as to which Transmission Operators (TOPs) need to be covered by this standard. This is to avoid placing undue burdens on small entities that would not have a deleterious effect on the reliability of the Interconnection. In that same vein, the SDT is allowing TOPs and BAs to provide needed backup functionality through third-party contract services. Again, this is an effort to reduce the burden on these entities without adversely impacting reliability.

The SDT has not included the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard. This position is in conflict with a directive in FERC Order 693. The SDT has discussed this issue at length and has been unable to come up with a reliability-based reason for centrally dispatched GOP inclusion. However, this position will need to be defended at FERC when this standard is filed. Along those lines, the SDT is working on a position paper outlining the reasons for this approach. A specific question has been included on this topic with a direct request for inputs from GOPs. In general, the SDT must provide an alternative approach that presents an equally effective and efficient solution to the one proposed in FERC Order 693. This could include items such as suggesting strengthening other standards, presenting business practices that may be followed now that would preclude the need for a backup control center, lesser cost alternatives, etc.

The SDT has also established timeframes for when backup capability must be available. These time frames are different for Reliability Coordinators (RCs) versus TOPs and BAs. Specific questions asking for feedback on these times have been included below. In addition, questions related to times involved for testing and re-establishment of primary/backup capability have been raised.

The Backup Facilities Standard Drafting Team would like to receive industry comments on this revised standard. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "BF Standards" by **March 7, 2008**.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

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

1. The SDT has attempted to limit the applicability provisions for Transmission Operators in this standard. Do you agree with this limitation? If not, please provide the reasons and alternatives.

Yes

No

Comments: We do not agree with the wholesale exclusion of all TOPs without Critical Assests or IROLs from the requirement of maintaining some semblance of backup functionality. We believe they should at a very minimum be required to maintain communication with their Reliability Coordinator. Therefore provisions should be made in the standard to include such a requirement.

Relatedly, should the SDT give consideration to an exclusion for small BAs?

2. The SDT has decided not to include the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard at this time. The SDT believes that there are other equally efficient and effective methods for the GOPs to continue to fulfill their role in preserving the reliability of the Interconnection following the loss of its control center. This position is contrary to a directive in FERC Order 693. The SDT will need to provide specific reasoning to FERC for adopting such an approach and is therefore, soliciting opinions from the industry. Do you agree with this approach? If not, please state the reasons and suggest an alternative. The SDT is particularly interested in receiving inputs from GOPs as to how they currently handle such a situation.

Yes

No

Comments: We believe that as a bare minimum GOPs that have a significant impact (total output of 100 MW or more) on the BES should be requiried to maintain communications with its host BA.

3. Requirement R6 — Do you think that the 2-hour transition time frame for Reliability Coordinators is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: Since Reliability Coordinators are currently required to adhere to a transition period of 1 hour, why shouldn't we maintain the 1-hour transition period requirement?

4. Requirement R7, R8.1, and R8.2 — Do you think the 2 to 6-hour time frame for applicable Transmission Operators and Balancing Authorities is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Comments: The transition plan should be a constant 2 hours for BAs and TOPS. This would then eliminate the need for R8.1 and R8.2.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

5. Requirement R12 — Do you think that implementation or testing operations for a minimum of two hours annually is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: We would propose two hours quarterly.

6. Requirement R13 — The SDT proposes that within 6 calendar months of having lost its primary control center or backup capability that an entity will have a plan in place for re-establishing backup capability. Is 6 calendar months appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

7. If you are aware of any regional variances that would be required as a result of this standard, or if you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement, please identify them here.

Yes

No

Comments:

8. If you have any other comments on the proposed standard that you haven't already provided in response to the questions above, please provide them here.

Yes

No

Comments: In Requirement 9 add the following phrase after manager: ...responsible for the operation of the primary control center.

We would suggest that R2 be expanded to require copies of the Operating Plan be shared with all entities/locations having an active role in the plan.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Please use this form to submit comments on the 1st draft of the standards for Backup Facilities (Project 2006-04). Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "BF Standards" in the subject line. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Stephen Joseph	
Organization:	Tampa Electric Co.	
Telephone:	813-630-6510	
E-mail:	sjjoseph@tecoenergy.com	
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input checked="" type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background Information

The Backup Facilities Standard Drafting Team (SDT) is submitting these questions as part of its initial effort in revising EOP-008. Extensive revisions have been made to the existing standard. Many of these changes are a direct result of comments received from industry and from FERC Order 693.

The SDT is attempting to come up with practical limits as to which Transmission Operators (TOPs) need to be covered by this standard. This is to avoid placing undue burdens on small entities that would not have a deleterious effect on the reliability of the Interconnection. In that same vein, the SDT is allowing TOPs and BAs to provide needed backup functionality through third-party contract services. Again, this is an effort to reduce the burden on these entities without adversely impacting reliability.

The SDT has not included the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard. This position is in conflict with a directive in FERC Order 693. The SDT has discussed this issue at length and has been unable to come up with a reliability-based reason for centrally dispatched GOP inclusion. However, this position will need to be defended at FERC when this standard is filed. Along those lines, the SDT is working on a position paper outlining the reasons for this approach. A specific question has been included on this topic with a direct request for inputs from GOPs. In general, the SDT must provide an alternative approach that presents an equally effective and efficient solution to the one proposed in FERC Order 693. This could include items such as suggesting strengthening other standards, presenting business practices that may be followed now that would preclude the need for a backup control center, lesser cost alternatives, etc.

The SDT has also established timeframes for when backup capability must be available. These time frames are different for Reliability Coordinators (RCs) versus TOPs and BAs. Specific questions asking for feedback on these times have been included below. In addition, questions related to times involved for testing and re-establishment of primary/backup capability have been raised.

The Backup Facilities Standard Drafting Team would like to receive industry comments on this revised standard. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "BF Standards" by **March 7, 2008**.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

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

1. The SDT has attempted to limit the applicability provisions for Transmission Operators in this standard. Do you agree with this limitation? If not, please provide the reasons and alternatives.

Yes

No

Comments:

2. The SDT has decided not to include the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard at this time. The SDT believes that there are other equally efficient and effective methods for the GOPs to continue to fulfill their role in preserving the reliability of the Interconnection following the loss of its control center. This position is contrary to a directive in FERC Order 693. The SDT will need to provide specific reasoning to FERC for adopting such an approach and is therefore, soliciting opinions from the industry. Do you agree with this approach? If not, please state the reasons and suggest an alternative. The SDT is particularly interested in receiving inputs from GOPs as to how they currently handle such a situation.

Yes

No

Comments:

3. Requirement R6 — Do you think that the 2-hour transition time frame for Reliability Coordinators is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

4. Requirement R7, R8.1, and R8.2 — Do you think the 2 to 6-hour time frame for applicable Transmission Operators and Balancing Authorities is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

5. Requirement R12 — Do you think that implementation or testing operations for a minimum of two hours annually is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

6. Requirement R13 — The SDT proposes that within 6 calendar months of having lost its primary control center or backup capability that an entity will have a plan in place for re-establishing backup capability. Is 6 calendar months appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

7. If you are aware of any regional variances that would be required as a result of this standard, or if you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement, please identify them here.

Yes

No

Comments:

8. If you have any other comments on the proposed standard that you haven't already provided in response to the questions above, please provide them here.

Yes

No

Comments:

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Please use this form to submit comments on the 1st draft of the standards for Backup Facilities (Project 2006-04). Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "BF Standards" in the subject line. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

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

Background Information

The Backup Facilities Standard Drafting Team (SDT) is submitting these questions as part of its initial effort in revising EOP-008. Extensive revisions have been made to the existing standard. Many of these changes are a direct result of comments received from industry and from FERC Order 693.

The SDT is attempting to come up with practical limits as to which Transmission Operators (TOPs) need to be covered by this standard. This is to avoid placing undue burdens on small entities that would not have a deleterious effect on the reliability of the Interconnection. In that same vein, the SDT is allowing TOPs and BAs to provide needed backup functionality through third-party contract services. Again, this is an effort to reduce the burden on these entities without adversely impacting reliability.

The SDT has not included the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard. This position is in conflict with a directive in FERC Order 693. The SDT has discussed this issue at length and has been unable to come up with a reliability-based reason for centrally dispatched GOP inclusion. However, this position will need to be defended at FERC when this standard is filed. Along those lines, the SDT is working on a position paper outlining the reasons for this approach. A specific question has been included on this topic with a direct request for inputs from GOPs. In general, the SDT must provide an alternative approach that presents an equally effective and efficient solution to the one proposed in FERC Order 693. This could include items such as suggesting strengthening other standards, presenting business practices that may be followed now that would preclude the need for a backup control center, lesser cost alternatives, etc.

The SDT has also established timeframes for when backup capability must be available. These time frames are different for Reliability Coordinators (RCs) versus TOPs and BAs. Specific questions asking for feedback on these times have been included below. In addition, questions related to times involved for testing and re-establishment of primary/backup capability have been raised.

The Backup Facilities Standard Drafting Team would like to receive industry comments on this revised standard. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "BF Standards" by **March 7, 2008**.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

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

1. The SDT has attempted to limit the applicability provisions for Transmission Operators in this standard. Do you agree with this limitation? If not, please provide the reasons and alternatives.

Yes

No

Comments: As long as the requirements in this standard are applicable to any transmission operator whose systems can impact reliability of the BES and not just registered TOPs.

2. The SDT has decided not to include the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard at this time. The SDT believes that there are other equally efficient and effective methods for the GOPs to continue to fulfill their role in preserving the reliability of the Interconnection following the loss of its control center. This position is contrary to a directive in FERC Order 693. The SDT will need to provide specific reasoning to FERC for adopting such an approach and is therefore, soliciting opinions from the industry. Do you agree with this approach? If not, please state the reasons and suggest an alternative. The SDT is particularly interested in receiving inputs from GOPs as to how they currently handle such a situation.

Yes

No

Comments: The Centrally controlled GOPs have to have a plan to operate if they lose their central control center.

3. Requirement R6 — Do you think that the 2-hour transition time frame for Reliability Coordinators is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

4. Requirement R7, R8.1, and R8.2 — Do you think the 2 to 6-hour time frame for applicable Transmission Operators and Balancing Authorities is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

5. Requirement R12 — Do you think that implementation or testing operations for a minimum of two hours annually is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: If the assumption applies to the implementation or testing operations of the backup center and not each individual.

6. Requirement R13 — The SDT proposes that within 6 calendar months of having lost its primary control center or backup capability that an entity will have a plan in place for re-establishing backup capability. Is 6 calendar months appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: 6 months is reasonable and makes its clear of the requirement that has not been available in the past.

7. If you are aware of any regional variances that would be required as a result of this standard, or if you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement, please identify them here.

Yes

No

Comments: Not aware of any at this time

8. If you have any other comments on the proposed standard that you haven't already provided in response to the questions above, please provide them here.

Yes

No

Comments: Clarity needs to be added to R 9.1 regarding the definition of "communication protocol"? For example, entities do not want to have to update the operating plan for changes such as an RTU communication protocol.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

Please use this form to submit comments on the 1st draft of the standards for Backup Facilities (Project 2006-04). Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "BF Standards" in the subject line. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Terri Eaton	
Organization:	Xcel Energy Services Inc.	
Telephone:	303-273-4878	
E-mail:	terri.k.eaton@xcelenergy.com	
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input checked="" type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input checked="" type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input checked="" type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input checked="" type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input checked="" type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background Information

The Backup Facilities Standard Drafting Team (SDT) is submitting these questions as part of its initial effort in revising EOP-008. Extensive revisions have been made to the existing standard. Many of these changes are a direct result of comments received from industry and from FERC Order 693.

The SDT is attempting to come up with practical limits as to which Transmission Operators (TOPs) need to be covered by this standard. This is to avoid placing undue burdens on small entities that would not have a deleterious effect on the reliability of the Interconnection. In that same vein, the SDT is allowing TOPs and BAs to provide needed backup functionality through third-party contract services. Again, this is an effort to reduce the burden on these entities without adversely impacting reliability.

The SDT has not included the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard. This position is in conflict with a directive in FERC Order 693. The SDT has discussed this issue at length and has been unable to come up with a reliability-based reason for centrally dispatched GOP inclusion. However, this position will need to be defended at FERC when this standard is filed. Along those lines, the SDT is working on a position paper outlining the reasons for this approach. A specific question has been included on this topic with a direct request for inputs from GOPs. In general, the SDT must provide an alternative approach that presents an equally effective and efficient solution to the one proposed in FERC Order 693. This could include items such as suggesting strengthening other standards, presenting business practices that may be followed now that would preclude the need for a backup control center, lesser cost alternatives, etc.

The SDT has also established timeframes for when backup capability must be available. These time frames are different for Reliability Coordinators (RCs) versus TOPs and BAs. Specific questions asking for feedback on these times have been included below. In addition, questions related to times involved for testing and re-establishment of primary/backup capability have been raised.

The Backup Facilities Standard Drafting Team would like to receive industry comments on this revised standard. Accordingly, we request that you include your comments on this form and e-mail to sarcomm@nerc.net with the subject "BF Standards" by **March 7, 2008**.

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

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

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

1. The SDT has attempted to limit the applicability provisions for Transmission Operators in this standard. Do you agree with this limitation? If not, please provide the reasons and alternatives.

Yes

No

Comments:

2. The SDT has decided not to include the Generator Operator (GOP) with a centrally dispatched control center as an applicable entity in this standard at this time. The SDT believes that there are other equally efficient and effective methods for the GOPs to continue to fulfill their role in preserving the reliability of the Interconnection following the loss of its control center. This position is contrary to a directive in FERC Order 693. The SDT will need to provide specific reasoning to FERC for adopting such an approach and is therefore, soliciting opinions from the industry. Do you agree with this approach? If not, please state the reasons and suggest an alternative. The SDT is particularly interested in receiving inputs from GOPs as to how they currently handle such a situation.

Yes

No

Comments: XES agrees with the drafting team that there are other means to address loss of a centrally dispatched generation control center besides requiring the burden and expense of back-up facilities. In many if not most cases the applicable Balancing Authority is fully capable of dispatching generation units directly in the event a centrally dispatched generation control center becomes inoperable making a backup control center for the generation dispatch function unnecessary.

3. Requirement R6 — Do you think that the 2-hour transition time frame for Reliability Coordinators is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

4. Requirement R7, R8.1, and R8.2 — Do you think the 2 to 6-hour time frame for applicable Transmission Operators and Balancing Authorities is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

Comment Form for 1st Draft of Standard for Backup Facilities (Project 2006-04)

5. Requirement R12 — Do you think that implementation or testing operations for a minimum of two hours annually is appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments: The provision should be revised to clarify whether the two-hour testing requirement is cumulative over the course of a year or whether the two-hour test is to be achieved over the course of two consecutive hours.

6. Requirement R13 — The SDT proposes that within 6 calendar months of having lost its primary control center or backup capability that an entity will have a plan in place for re-establishing backup capability. Is 6 calendar months appropriate? If not, please state the reasons and suggest an alternative.

Yes

No

Comments:

7. If you are aware of any regional variances that would be required as a result of this standard, or if you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement, please identify them here.

Yes

No

Comments:

8. If you have any other comments on the proposed standard that you haven't already provided in response to the questions above, please provide them here.

Yes

No

Comments: