

















































**Individual or group. (38 Responses)**  
**Name (24 Responses)**  
**Organization (24 Responses)**  
**Group Name (14 Responses)**  
**Lead Contact (14 Responses)**  
**Contact Organization (14 Responses)**  
**Question 1 (37 Responses)**  
**Question 1 Comments (38 Responses)**  
**Question 2 (36 Responses)**  
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**Question 4 (36 Responses)**  
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**Question 5 (32 Responses)**  
**Question 5 Comments (38 Responses)**  
**Question 6 (34 Responses)**  
**Question 6 Comments (38 Responses)**  
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**Question 8 (36 Responses)**  
**Question 8 Comments (38 Responses)**

-	-
	Individual
	Jianmei Chai
	Consumers Energy Company
	
	Yes
	
	Yes
	
	No
	M7. calls for "shall have dated evidence that its backup capability does not depend on the primary control center for any functionality required to maintain compliance with Reliability Standards in accordance with Requirement R7." This is subjective as to what that evidence consists of and leaves to much to interpretation. Is a letter stating there is no dependance suffice? Will it suffice regardless of who the auditor is?
	
	
	Yes
	This standard is overbaring and requires far more documentation than is needed to maintain reliability and accomplish the goals of adequateds back-up facilities. For example, could the annual test be considered the review of the Operating Plan? Is it sufficient documentation that proof a test has been conducted and was successful in operating the system?
	No
	When drafting standards we should keep in mind the primary goal. That goal is to provide a high level of reliability. There needs to be a balance between the actions of making our operations reliable or taking away from that effort by putting a program in place that majority of effort is administrative, thus detracking from the original goal. Back-up facilities are needed but the amount of data being requested here seems to be excessive burdan that changes the focus from preparing for back-up operations to preparing for a NERC audit.
	Group
	WECC Reliability Coordinator Comment Working Group


	Linda Perez
	WECC
	Yes
	
	Yes
	
	Yes
	
	Yes
	
	Yes
	
	Yes
	
	No
	
	Yes
	
	Individual
	Todd Lietz
	Puget Sound Energy
	Yes
	Since there are many differences in size and effect on the BES of the many registered TOPs, there should be a mechanism where the RRO or RC determines the level of risk an entity poses to their area should they lose their control center. Just because a small entity has a line or two that fits the all encompassing definition of BES, does not place the same burden on the system as a large path operator with hundreds of lines. Some entities are large enough where they should have a staffed backup facility. Implementation of costly plans simply due to a registration type that does nothing to increase reliability should be avoided. Costs are passed on to customers. Simply stating it is for reliability does not justify it to them.
	Yes
	
	Yes
	
	No
	M.3 - There needs to be clarification in either the requirement or the measure as to the definition of "directing", "entity" and "control functionality". Was this intended to be the TOP that is acting as a host for a DP, or say a GOP? Does the loss of functionality mean a RTU being down now must be addressed in the loss of control center plan for the TOP? Does this even need to be a requirement since R.5 is so vague and encompassing? Why just the TOP and not BA's that are providing regulation services of acting as a host to others? The measurement and requirement are open to interpretation. Both need to be clear, concise and measurable. M.6 - The requirement and measure ask for approval. What level of approval does the SDT expect for this? If the SDT does not feel the need to specify, then why have it. M.7 - The measure requires dated evidence of a negative statement. Proving a negative in an audit is not easy. Could a statement in the current, dated Operating Plan stating it does not rely on the primary facility be sufficient evidence? I know the SDT does not determine what is acceptable to an auditor, but measures asking for dated proof that something does not exist, did not happen or are not dependent should be avoided. Will I have to provide dated evidence that I did not lose my primary capability for six months in M.9 as well? M.8 Providing evidence that the Operating Plan and backup functionality were tested is definitely needed. The current wording of the requirement and measure could be interpreted as each version of the plan must be tested. If a test is done, and the plan is subsequently updated with lessons learned as required in R8.3, the new dated, current, in force plan would not have evidence of being tested. I know this is petty and just semantics, but compliance people may take it literally.
	No

	R.3 Since the terms of this requirement and measure are not clearly defined, there is no clear way to determine what percentage was met. R.5 What mechanism will be used to determine the percentage of standards can be or could be met?
	No
	This depends on the interpretation of R.5. The statement of "during the time period when the primary control center and the back up functionality are both available for use" is vague. Does this refer to the time period when an entity is in the process of constructing a backup facility or is it referring to the transition time in R.1.5? If it is the time of R.1.5, this is a huge monetary and resource burden. Essentially it would require an entity to have a staffed fully redundant backup facility 24x7, or a contract with another entity with 24x7 staff properly trained to monitor, control, log and respond to alarms on another entities entire system. If this is the case, then 24 months may not be adequate.
	Yes
	R.5 needs further clarification as stated in my response to the previous question. R.1.6.2. The definition of "actions to manage risk" is vague. This again points to R.5. If an entity has notified affected entities that it is in the process of transitioning to the back up facility and made notifications to implement the plan, aren't these actions to manage risk to the BES? I am not sure what the SDT had in mind with this requirement.
	Yes
	However, I am concerned that many of the additional requirements of this standard do not add to reliability, just increase documentation requirements, staffing and costs for a minimal increase in reliability. I am not aware of an instance where an entity has implemented their loss of control center plan and placed the BES in a perilous situation. There are actually few entities large enough to have this affect. I am fully on board with RCs having the capabilities prescribed in this standard, but there are many entities for which this is overkill. Perhaps the standard should place the burden on the RRO or RC to determine adequate levels of backup facilities for the BAs and TOPs under their jurisdiction.
	Individual
	Randy Schimka
	San Diego Gas and Electric
	Yes
	Yes
	Yes
	Yes
	No
	We would like to see additional consistency used between the Requirements verbiage and the Violation Severity Level table verbiage, particularly with respect to R8 (although this same terminology appears elsewhere as well). The Requirements verbiage for R8 uses the term "annual" in the description when referring to testing, whereas the VSL table refers to a period of "12 calendar months." In discussing the terminology with others, there seems to be a difference of opinion of the definition of the word "annual" when it comes to NERC compliance. Some people think that the particular requirement can be fulfilled anytime within a particular calendar year (one year in July and the following year in September and the following year in May, etc.), whereas others believe that an August 1 test date in one year means that the same testing must be completed before August 1 in the following year to remain in compliance. The issue with the latter interpretation of "annual" is that the requirement will suffer from date creep every year, as the entity completes the compliance requirement in advance of the prior year. Over time, this date creep will ultimately cause entities to have to perform testing and other requirements at times of the year when we don't want to do them (i.e. summer periods) or do them too far in advance. We believe the requirement should be spelled out specifically so the definition is crystal clear (i.e every 11 months plus or minus 30 days).
	Yes
	Yes
	R5 - We would like to get some clarification on Requirement 5, particularly with respect to the opening sentence that refers to the time period when primary and backup control center functionality is available for use, then the requirement is to have backup functionality. If both primary and backup control centers are available for use, doesn't that automatically mean that backup functionality is available? Please clarify the meaning of this

	Requirement. R6.1 - We would like further clarification to the term "changes to the backup capabilities" that would require an update and approval of the Operating Plan. What are examples of changes to backup capabilities that would trigger an update of the Operating Plan? What are examples of changes to backup capabilities that are considered more "minor" that wouldn't require an update?
	Yes
	Individual
	Dan Brotzman
	ComEd / Exelon
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	R5 addresses maintaining the backup functionality that includes monitoring, control, logging, and alarming. M5 requires dated evidence (documentation) that you have demonstrated the backup functionality for the requirements in R5. However R8.2 addresses the testing of the backup functionality through actual implementation or test operation for a minimum of two consecutive hours. The requirements of R5 should be incorporated into R8.2 and therefore R5 eliminated as a standalone requirement. As it is currently written in draft 2, R5 & R8.2 are redundant and M5 & M8 are redundant in terms of practical application and verification of compliance.
	Yes
	Group
	Entergy System Planning & Operations (Generation & Marketing)
	Will Franklin
	Entergy
	No
	No
	It is not apparent as to the basis for this number. Is it arbitrary or based on some technical concern? State as such. A statistical risk analysis would be ideal to determine this allowable time, if a valid model exists. If an arbitrary value is used, then an industry survey or something similar (experts/EPRI) may be appropriate (e.g. EPRI Project RP2473-68)
	Yes
	Yes
	No
	Consider adding to the implementation requirement that entities comply within the timeframe stated or if an entity believes it will take longer than the specified time to become compliant, allowing entities to apply for an extension

to the timeframe stated if that entity can justify the need for an extension to its Regional Compliance Entity. Each entity desiring the extension shall submit a plan and obtain approval from its Regional Compliance Entity within 6 months of approval of this standard. The Regional Compliance entity will review the requests and approve on a case by case basis. Compliance would be required after the date approved by the Regional Compliance Entity.

 Yes


 The use of the term "control center" needs definition and align with that which will be used in the CIP critical asset identification methodology. The terms "primary" and "back up" control center or functionality should also be defined. R1.1 the use of the term "prolonged" is subjective and should be revised to identify a definite period of time. R1.2.4 the actual power supply requirements should go here. BAL-005 R15 regarding back up power supplies should be revised and transplanted to this standard. consider consulting with the BACSDT on moving and enhancing this requirement. R1.3 is vague - "Keeping...consistent" may be redundant to the requirements already listed unless it is intended to mean something else. if so, be specific. R4 & 5 both contain the phrase "during the time when the primary control center functionality and the backup functionality are both available for use". what is the intent of this phrase. Does this mean that the remainder of the requirement does not apply if both are not available for use? Recommend removing this phrase from both requirements. R6.1 should apply only to changes that are related to Reliability Standards or other items specifically identified. Otherwise even very minor changes (such as corporate related features) would be subject to this requirement even though there is no reliability impact. R8. the term "annual" needs better definition in this standard or within the NREC Standards. Does annual mean every calendar year, or every 12 months? R8.3 should simply state "Test results shall be documented.". Lessons learned, etc are related to corporate and industry practices and are not part of reliability standards, otherwise there would need to be an entire standard for a corrective action process. R9 is not needed. The way this standard is written, there is NO allowable outage time permitted on either the primary or back up control center. As soon as one is unavailable the entity is immediately non-compliant. For an entity to continue to operate in non-compliance would be a significant exposure to penalties. What this standard really needs are requirements that describe the allowable outage time on the primary and back up control centers. The reality is that at some point every entity will need to disable one of their facilities so that maintenance can be conducted (whether it be planned or unplanned). Consider adding provisions for short term planned and unplanned outages on either the primary or back up control center. This would be similar to outage "time clocks" in the nuclear world. This would allow entities to make repairs and upgrades on the primary and back up control centers without automatically being non-compliant when conducting such activities.

 Yes




 Individual


 Kris Manchur


 Manitoba Hydro


 No

 I suggest the applicability for the Transmission Operator be changed to the following: "Transmission Operator operating Bulk Electric System (BES) Facilities at 100 kV or higher, including those Facilities demonstrated by the Regional Entity to be critical to the reliability of the Bulk Electric System." The Transmission Operator that just has a radial connection to the BES is taken care of by the definition of Bulk Electric System which states: "Radial transmission facilities serving only load with one transmission source are generally not included in this definition."


 Yes




 Yes





 Yes




 Yes




 Yes




































 No



 Yes























	Individual
	Richard Salgo
	Sierra Pacific Power Co. (dba NV Energy)
	No
	We would recommend the deletion of the last portion of the applicability statement in 4.1.2. The suggestion is to delete "or Facilities demonstrated by the Regional Entity to be critical to the reliability of the Bulk Electric System (BES)". We believe this part of the applicability is highly subjective and would result in uncertainty among entities who are excluded today, but could suddenly be subject to this Standard due to a subjective judgment call made by their Regional Entity at some point in the future. The Regional Entities presently do not exhibit consistency in their determination of the components of the BES, and quite likely would be even less consistent in a determination of facilities "critical to the reliability of the BES". The applicability statement that would remain after this suggested deletion would not only be clear and objective, it would also point to the specific entities that should be responsible for complying with this Standard.
	Yes
	This is an improvement to the Standard.
	Yes
	The VRF's and Time Horizons appear to be appropriate.
	Yes
	
	No
	In R2 Lower, we recommend that the VSL language be amended to strike "located in one of its control locations" and replace with "available to Operators at one of either the primary or backup control centers" and in R2 Moderate, amend to remove "located in either of its control locations" and replace with "available to Operators at any of its control locations". In R5, it appears that the degree of severity will be nearly impossible to determine. The VSL language calls for a determination of exactly what percentage of the Reliability Standards can be complied with from the backup center. While we don't have a specific suggestion, we believe that the Auditors will have a very difficult time making a determination with the VSL's as written. In R7, there is only one VSL and it is "severe". The degree of violation here must depend upon the level of dependency that the backup functionality has upon the primary control center and the number and relative importance of the functions for which that dependency exists. We respectfully disagree with the exclusion of Lower, Moderate and High VSL's and the classification of any violation as being "severe" for this Requirement.
	
	Yes
	In R1.3, a requirement is made to have a process for keeping the backup functionality "consistent" with the primary control center. The word "consistent" will be subject to much interpretation. Backup Control Centers inherently carry somewhat less functionality than the primary centers even though they may satisfy all of the compliance requirements with the Reliability Standards. In R2, we suggest a change in the language to say "...shall have its Operating Plan for backup functionality available to its System Operators at its primary control center..." This would allow for the use of electronic document management, as many entities have moved away from the tedious chore of maintaining hard-copy procedures in their control centers and should not be found non-compliant for using a progressive electronic document management solution. R3: It is unclear what is meant by directing BES operations through other entities, and what would constitute including "provisions for loss of those entities' control functionality". If for example, we direct BES operations through issuing switching instructions to a TO entity in our balancing area, do we become responsible for the loss of that TO's primary control center under this language? If this is the implication, we believe this Requirement is inappropriate. R4/R5: Why is there a conditional statement present in these Requirements ("...shall, during the time period when the primary control center functionality and the backup functionality are both available for use,...")? This literally states that this Requirement is inactive upon loss of the primary control center. After reading it several times, we continue to be unclear about the intent of that conditional statement. R6: We don't believe it is reasonable to require entities to update, approve, and keep necessary documentation for minor changes to backup facility plans for items such as "contact information". Phone numbers, fax, cell numbers, etc are all relatively dynamic, and should lie below the threshold of providing full plan updates. Perhaps this update/approval is needed for material changes to the Plan, Process or notification protocols, but minor, insignificant edits should not require this degree of documentation. R7: This specifies that the backup capability shall not depend on the "primary control center" for functionality to maintain compliance with the Standards. This is where much interpretation may arise. Most backup control facilities will have a fully redundant EMS computer, but it may depend on SCADA information that passes through the building which houses the primary control center. Such communications are outside the primary control center, yet in the same facility. Would this situation constitute a "dependency upon the primary control center, and if so, is the intent of this Requirement to expand beyond the confines of the "Primary Control Center" itself? R8.3: We suggest that it is unnecessary to

	document and incorporate into subsequent Plan revisions items that are characterized as "lessons learned". We should always be learning from test results and improving plans and processes, but as a compliance requirement, we believe this is onerous. Suggest replacement of the term "lessons learned" with "deficiencies", such that it reads "Test results shall be documented and deficiencies noted and incorporated in subsequent revisions of the Operating Plan for backup functionality".
	Yes
	Yes and No. This Standard has some very positive attributes that will help the industry attain an adequate level of reliability. These include the requirement to establish a Plan and Process for transition to the backup center, the definition of transition time from Primary to Backup center and the requirement to conduct an annual test of the functionality. These are necessary elements to ensure reasonable functionality of the backup plan to continue operations. Where it perhaps goes to far is in the areas of requiring auditable records of updates/approvals for minor and insignificant changes to the Plan, and the prescription of the level of redundancy being unclear and perhaps impossible to comply with depending on the assumptions made about the contingency that causes the backup plan to be executed.
	Individual
	D. Bryan Guy
	Progress Energy Carolinas, Inc.
	Yes
	
	No
	Transition Period – Different transition period requirements are needed in order to correlate with the various reasons that a primary control center can be lost. A blanket 2-hour requirement forces a backup site to be within approximately 60 - 90 miles of the primary site to cover the scenario of the quick loss ("crater") of the primary center, where offsite personnel must travel from a non-business location to the backup site. However, this distance is insufficient to protect against the loss of both the primary and backup centers due to a major storm, such as a hurricane. Either the transition period needs to be increased to 4 hours, or exceptions are needed for centers located in hurricane-prone areas. Clarification requested as to what constitutes "loss of primary control center functionality" and what constitutes "backup functionality up and running"? Is the functionality to mean at a minimum the aggregate abilities to monitor/maintain frequency, perform AGC, calculate ACE, and perform interchange scheduling (for BA's) and/or for TA's, the minimum aggregate abilities to monitor and control transmission system voltages, power flows, the switching of transmission elements, and ability to respond to IROL's and SOL's violations? Suggest better definition which would identify the minimum as being any one (or all) of the following: -- loss of ability to monitor and provide basic tie line control for maintaining the status of all inter-area schedules, -- loss of ability to monitor and control critical transmission facilities, generation control, voltage control, time and frequency control, control of critical substation devices, and logging of significant power system events. -- loss of ability to maintain basic voice communication capabilities with other areas.
	Yes
	
	No
	What is purpose of requiring Operating Plans to be retained for prior 3 years? It should be satisfactory to maintain current active plan with retention revisions of last full calendar year unless there has been a compliance violation identified by the Regional Compliance entity. R8 – Does a test in January of one year followed by a test in December of the following year meet the requirement of an "annual" test? If not, the wording here should match Violation Security Levels section D.2.R8. M5 – Does this require a document detailing each requirement of all Reliability Standards along with a description of how each is satisfied at the backup (similar to an audit response)? If not, what else can satisfy this measure? M7 – Does this require a document detailing each requirement of all Reliability Standards along with a description of how it is satisfied at the backup (similar to an audit response) without utilizing equipment at the primary? If not, what else can satisfy this measure? D.1.4, 5th bullet (related to M5) – Does this require a demonstration of adequate backup functionality to be repeated and documented at least once between compliance audits? This measure is not needed since R8/M8 requires an annual test with documentation. D.2.R8, Lower Level – States that a violation occurs if subsequent tests occur more than 12 months apart. Section B.R8 states that an annual test shall be conducted. Unless the term "annual" is defined as "every 12 months" in a reference document, these descriptions must match.
	No
	Reference section D.2 Violation Severity Levels R5 -- there are specific percentages stated therein, how are they calculated? Is it per standard or per individual requirement and sub-requirements?
	No
	Effective Date – 24 months is not adequate time to address such a significant change in requirements from EOP-














































	<p>008-0. The requirement is changing from a recovery plan to a hot-standby backup available within 2 hours. Additional time is needed to choose a backup methodology, budget accordingly, purchase/construct a backup site (or negotiate with another entity, though the feasibility of this is questionable), design backup voice and data communications, and implement – all per CIP requirements while upgrading existing primary equipment/facilities to meet CIP requirements with implementation schedules through 2010. This requires multi-million dollar actions that must be addressed with a methodologically sound approach to avoid rework and undue financial burden. PEC suggests an implementation period of 1) 36 months for Substantial Progress (i.e. groundbreaking) and 2) 48 months for full implementation.</p>
	Yes
	<p>R5 – Compliance with all Reliability Standards should not be required immediately upon transition to the backup. The focus at immediate transition must be solely upon standards directly-related to essential BES reliability. This is evidenced within this standard by choosing an annual test only lasting 2 hours, which will only verify the basic functionalities of SCADA, alarming, voice &amp; data communications, AGC, state estimator and contingency analysis. The requirement to immediately meet all standards causes undue time/finances to be spent on hot-backup technology for non-essential functions, and thus decreases attention to essential functions. Non-essential standard requirements such as inadvertent/interchange check-outs, TTC/ATC postings, transaction tagging, etc should be identified, and a longer transition requirement specified, such as 48 hours. R7 – How does this apply to a situation where primary EMS or voice communication equipment resides in a facility geographically separate from the primary center's control room? Does the phrase "does not depend on the primary control center" refer to the control room facility only, or does it also apply to the facility housing EMS/voice communication equipment? What distinguishes equipment for compliance to this standard versus CIP-009-1?</p>
	Yes
	Group
	NPCC
	Guy Zito
	NPCC
	No
	The addition of the wording "operating Facilities at 200 kV or above, or non-radial Facilities above 100 kV," is not appropriate.
	Yes
	No
	<p>We agree with the VRFs for R1 to R8 but not R9. We assess the reliability impact of (R9) failure to come up with a plan 6 months after an entity has experienced a loss of its primary control center or backup capability and expects such loss to last for 6 months or more is lower than any of the other requirements that are assigned a Medium VRF. We therefore suggest a Lower be assigned to this requirement.</p>
	Yes
	<p>We do not agree with some of the requirements (see our comments under Q7) and hence some Measures may need to be revised if the SDT agrees with any of our suggested changes to the requirements.</p>
	No
	<p>(i) R2: It requires a copy of the plan be provided at both the primary and backup facilities. Failing to provide any copy at all is a complete violation of the requirement and hence should be assigned a Severe VSL, not Medium (note that VSL is a measure of the extent to which a requirement is not met, not its impact). We therefore suggest to move the two conditions from Low/Medium to High/Severe in accordance with established VSL guidelines. (ii) R4: The Severe level should include a condition that the RC provides less than 70% of the functionality required for maintaining compliance with the Reliability Standards applicable to an RC. Otherwise, there will not be any VSL for RC providing functionality sufficient for maintaining compliance with, say, 40% of the Reliability Standards. Further, the proposed wording change, i.e., &lt;70%, covers the condition of not having any functionality at all to comply with reliability standards. (iii) R5: Same comment as in (ii) except the entities are the BAs and applicable TOPs. (iv) R6: There are no VSLs assigned to High and Severe. We suggest the SDT to provide the conditions that an entity fails to meet the bulk of the intent of this requirement (High) and fails to meet this requirement completely (Severe). For example, a High VSL can be assigned if the entity did not review and if necessary update its plan after 18 months, or 120 calendar days after changes were made to the backup capability; a Severe for failing to review and if necessary update its plan for a longer time period or not at all.</p>
	Yes



	Yes
	R3: It stipulates that "Each applicable Transmission Operator directing BES operations through other entities shall include provisions for the loss of such entity's control functionality in its Operating Plan for backup functionality." We do not agree that this requirement applies to the TOP only. There might well be situations that an RC or a BA directs it operations through other entities as well. We suggest the requirement to also include the RC and the BA by rewording to: "Each Reliability Coordinator, Balancing Authority and applicable Transmission Operator directing BES operations..." R4: We are not sure why the condition: "...during the time period when the primary control center functionality and the backup functionality are both available for use..." is included since having both control center functionalities available for use suffice to meet the condition for: "...have a backup control center facility (provided through its own dedicated backup facility or at another entity's control center) that provides the functionality required for maintaining compliance with all Reliability Standards applicable to the Reliability Coordinator." If the intent of this requirement is to ensure the functionality works, then the requirements should simply stipulate such a demonstration. In fact, the intent of R8 is to ensure that the backup capability is functional when called upon. We therefore hold the view that R4 (and R5) is not needed, be eliminated, and include the required clarifications in the Measures Section. R5: Please see our comments on R4. We do not think R5 is needed. If retained, the wording should be changed to require a demonstration of the backup capability's functionality. R7: We do not see the need for this to be a stand alone requirement. This requirement can be included as one of the sub-requirement in R1, or even combined with R1.3.
	Yes
	Backup functionality for RCs, BAs and applicable TOPs are essential to ensuring continuous reliable operation of the BES. This standard is needed to provide this assurance.
	Group
	Southern Company Transmission
	Roman Carter
	Southern Company Transmission
	Yes
	
	Yes
	
	Yes
	
	No
	**For Requirement 5, a cursory review of the applicable BA and TOP standards left uncertainty as to whether some standards pertain to monitoring, control, logging, or alarming actions within the requirements. For example, BAL-005 states that the TOP must be included with the metered boundaries of a BA Area. NERC standard COM-001 states the TOP shall provide adequate and reliable telecommunications facilities. Unless there is a definite and an agreeable number of standards applicable to the TOP and BA pertaining to monitoring, control, etc., it is difficult to determine whether you exceed the 70/80/90% thresholds associated with Lower, Moderate, or High VSLs. Until there is a predetermined number of applicable standards that can be used as a benchmark for determining the correct level of VSL, it is recommended that only the Severe VSL be utilized along with its current criteria. **For R8, it is recommended that the 3 components contained within the Lower VSL be staged for Lower, Moderate, and High VSL. For example, if an registered entity failed to fulfill one of the components (e.g., testing for less than 2 hours), this would result in a Lower VSL. If a registered entity failed two components (e.g., tested < 2 hours AND it was done in more than 12 calendar months), then this would equate to a Moderate VSL. To fail to meet all three components would equate to a High VSL.
	Yes
	
	Yes
	**In reference to the Applicability Section 4.1, the following recommendation on the format is suggested: 4.1.2 Transmission Operators that operate Facilities defined below: 4.1.2.1 Facilities operated at 200 kV or above 4.1.2.2 Non-radial Facilities operated at 100 kV 4.1.2.3 Facilities demonstrated by the Regional Entity to be critical to the reliability of the Bulk Electric System (BES) In addition to the format change noted above, there could be a misinterpretation with use of the term 'critical' in this standard considering its significance to CIP-002? We suggest you consider the terms crucial, important, etc. as an alternative word for critical. **With respect to R1.1, an

	<p>Operating Plan should include the location for providing backup functionality. There is a concern with how much specificity is required. If the Operating Plan becomes available to the public, the inclusion of the detailed location of a backup control center may unnecessarily create exposure to CEII information. **Requirement R1.1 does not clarify the meaning of "prolonged period of time." It is not clear if this means eight days or eight months for example. Should there be some correlation to Requirement R9, which provides that six months is the threshold for notifying the Regional Entity about restoration efforts? **The standard should consistently group sub-requirements under each of the relevant components – Operating Plan, Operating Procedure, and Operating Process. As written, the arrangement is too scattered. Note the order of the requirements and how they are grouped: Requirements R1.1, R1.2, R1.5, and R1.7 correlate to the Operating Plan; Requirements R1.3 and R1.6 correlate to the Operating Process; and Requirement R1.4 correlates to Operating Procedures. The following recommendations ensure more consistency: (a) Insert R1.7 after R1.2 since R1.7 addresses identification of roles for the Operating Plan. It should not be the last item. **R1.5 should be put under R1.6 as a sub-requirement. Also reword the requirement to say The transition period between the loss of primary control center functionality and the time to fully implement the backup plan and get backup functionality up and running must not exceed two hours. **Under R3, it is unclear as to what the requirement is stating. Are you saying that a registered entity that is relying entirely on other entities to perform the TOP function is also responsible for making sure their Operating Plan provides provisions for the loss of each of the other entities' control functionality? Are there such "Pseudo TOPs" out there that this describes? Clarification would be good for Industry.</p>
	No
	Not in its current form. However, with the changes we have recommended, we believe that it could.
	Individual
	Alice Druffel
	Xcel Energy
	Yes
	Yes
	No
	Data retention should be 3 years.
	Yes
	Yes
	<p>R1.5 Please clarify what you mean by "fully implement" and "get backup functionality up and running". As written, this requirement is too vague. Related to R1.5, please modify M1 to include clarifying language such as "functionality required for maintaining compliance". R1.2.1 Please clarify what is meant by "visualization capabilities". This statement is too vague and leaves too much room for interpretation. R1.3 Please clarify what is meant by "consistent". What processes need to be covered? This requirement is too vague and general, which leaves too much room for interpretation. R1.6 Please clarify/outline what minimum actions are required during the transition period. R1.6.2 To be more clear, we recommend changing "risk" to "impact". R5 As drafted, this requirement implies that both the primary and backup control centers have to be in operation at the same time. This is not practical, as only one control center can communicate with the RTUs. This requirement should be reworded. R6.1 Strike "contact information". This is not necessary to include in the requirement. R8.2 Testing for a minimum of 2 continuous hours is unnecessary and problematic b/c we would lose accounting data which affects our CPS reporting data. A minimum test of 30 minutes is reasonable and sufficient. Please either modify to 30 minutes or provide a factual basis for the 2 hours.</p>
	Yes
	There are some areas of concern that need addressed/ clarified. However, if they are properly addressed, then we feel this standard will help deliver an adequate level of reliability.
	Individual
	Edward J Davis
	Entergy Services, Inc
	No

	<p>We suggest the Applicability to Transmission Operators (4.1.2) be revised as follows to improve readability, to address the ambiguity of the use of the word "critical", and to address section c of the Applicability statement. Use of the term "critical" is vague and causes confusion as evidenced in the Vegetation standards, Cyber standards, and others. We suggest not using "critical" and revising the Applicability to address what is desired - requiring backup functionality for operators of "transmission facilities that have a material impact on the reliability of the BES." We suggest the following Applicability for Transmission Operator: 4.1.2. Transmission Operator operating: a) Transmission Facilities at 200 kV or above, or b) non-radial Transmission Facilities above 100 kV, or c) Transmission Facilities operating at voltages lower than those identified in a) or b) that are demonstrated to have a material impact on the reliability of the Bulk Electric System (BES)</p>
	<p>Yes</p>
	
	
	<p>No</p>
	<p>M4 and M5 contain the phrase "shall provide dated evidence that it has demonstrated that it has a (BCC)..." Measures should not include requirements. These measures include new requirements and unspecified additional measures on several unspecified entities. These measures include a requirement that the RC, BA or TOP "demonstrate" BCC functionality to some unspecified entity and then that unspecified entity must "provide dated evidence" to the RC, BA and TOP so the RC, BA and TOP can provide that "dated evidence" for evidence of compliance. This requirement for demonstration to, and approval by, some unspecified entity is not in the NERC standards. We suggest the demonstration aspect of these measures be deleted and the measures be changed to: "M4. Each Reliability Coordinator shall provide dated evidence that it has a backup control center facility ....." "M5. Each Balancing Authority and applicable Transmission Operator shall provide dated evidence that it's backup functionality ....."</p>
	<p>Yes</p>
	
	
	<p>Yes</p>
	<p>The terminology in R1.1 "for a prolonged period of time" is too vague. Please be more specific. The TOP situation indicated in R3 is unclear. What is the arrangement of a TOP directing BES operations through other entities? Is it envisioned that the TOP might be using, say, the RCs control center to run the TOP's BES? Please change the language so the applicability of this requirement is obvious. The rewording of R4 and R5 is confusing. Instead of trying to include all the ideas into one sentence, it would be better and more clear to include a couple of separate sentences. For instance, we suggest for R4, and similar wording for R5: "R4. Each Reliability Coordinator shall have a backup control center facility that provides the functionality required for maintaining compliance with all Reliability Standards applicable to the Reliability Coordinator. This functionality may be provided through its own dedicated backup facility or at another entity's control center. If the loss of the primary or backup capability has already been experienced, a second backup facility is not immediately necessary, i.e., double redundancy is not necessary."</p>
	
	<p>Individual</p>
	<p>Greg Rowland</p>
	<p>Duke Energy</p>
	<p>Yes</p>
	
	<p>No</p>
	<p>We agree that two hours is appropriate for all applicable entities. However we think more clarity is needed on exactly what is required within two hours. R1.5 should be revised as follows: "A transition period between the loss of primary control center functionality and the time to fully implement the backup functionality elements identified in R1.2 that is less than or equal to two hours". R1.6 should be revised as follows: "An Operating Process describing the actions to be taken during the transition period between the loss of primary control center functionality and the time to fully implement the backup functionality elements identified in R1.2. The Operating Process shall include, at a minimum:". R8.1 should be revised as follows: "A demonstration of the transition time between the loss of primary control center functionality and the time to fully implement the backup functionality elements identified in R1.2".</p>
	<p>Yes</p>
	
	<p>No</p>

	This standard uses the terms "control center", "capability", "facility" and "functionality" somewhat interchangeably. We believe the standard should consistently use the term "functionality" in the Requirements, Measures and Data Retention (see detailed comment #7 below). The Data Retention requirements are onerous and need further review. For example, there is no need to retain three years of old Operating Plans for backup functionality.
	No
	Once the requirements are revised, the VSLs need to be revisited and cleaned up accordingly. For example, the Lower, Medium and High VSLs for R4 and R5 are unworkable - how can anyone document that the backup functionality includes monitoring, control, logging and alarming sufficient to maintain compliance with 90%,80%, 70% of the applicable requirements of other standards? This would require an impossible burden of recordkeeping. The VSL for R8 imposes a new requirement - that the entity demonstrate through a test that the transition time is less than or equal to two hours.
	Yes
	
	Yes
	Detailed edits - see revisions in CAPS below: R1 - Each Reliability Coordinator, Balancing Authority, and applicable Transmission Operator shall have an Operating Plan describing the manner in which it ensures reliable operations of the BES in the event that its primary control center FUNCTIONALITY becomes inoperable. This Operating Plan for backup functionality shall include the following at a minimum: R1.1 - The location and method of implementation for providing backup functionality for a prolonged period of time, AS DEFINED BY THE OPERATING PLAN. R1.2.5 - Physical and cyber security. SDT SHOULD DELETE THIS REQUIREMENT SINCE IT IS COVERED IN THE CIP STANDARDS REQUIREMENTS. R1.3 - An Operating Process for keeping the backup functionality consistent with the primary control center FUNCTIONALITY. R3 - Question : What is an entity? More importantly, what is NOT an entity? R4 and R5 - COMBINE THESE TWO REQUIREMENTS INTO ONE AS FOLLOWS: "Each Reliability Coordinator, Balancing Authority and applicable Transmission Operator shall, during the time period when the primary control center functionality and the backup functionality are both available for use, have backup functionality (such as monitoring, control, logging and alarming) needed to maintain compliance with all applicable Reliability Standards". R6.1 - The update and approval of the Operating Plan for backup functionality shall take place within sixty calendar days of any changes to the backup FUNCTIONALITY AS DEFINED IN R1.2. R7 - Each Reliability Coordinator, Balancing Authority, and applicable Transmission Operator shall have backup FUNCTIONALITY that does not depend on the primary control center for any functionality required to maintain compliance with Reliability Standards. R9 - Each Reliability Coordinator, Balancing Authority, and applicable Transmission Operator that has experienced a loss of its primary or backup FUNCTIONALITY and that anticipates that the loss of primary or backup FUNCTIONALITY will last for more than six calendar months, shall provide a plan to its Regional Entity within six calendar months of the date when the functionality is lost, showing how it will re-establish backup FUNCTIONALITY. M1 - Each Reliability Coordinator, Balancing Authority, and applicable Transmission Operator shall have a dated, current, in force Operating Plan for backup functionality in accordance with Requirement R1, in electronic or hardcopy format, with evidence of its last issue, describing the manner in which it ensures reliable operations of the BES in the event that its primary control center FUNCTIONALITY becomes inoperable. M4/M5 - Language needs to match exclusions included in R4/R5. Same clean up as noted in R4/R5 comments above M7 - See comment on R7 above M9 - See comment on R9 above
	Yes
	It appears that this standard is moving in the right direction.
	Group
	Electric Reliability Council of Texas, Inc.
	Vann Weldon
	ERCOT Inc.
	Yes
	
	Yes
	
	Yes
	
	No
	M5: change "it's" to "its" M7: delete if R7 is made part of R1 M8: this measure and the related data retention requirement (Bullet 8) imply that testing must occur immediately on changing the Plan. Also change "such testing" to "previous testing" M9: change if R9 is changed Data Retention Bullet 3: this will be hard to do until the standard

	has been in place for several years. It may be deleted if R3 is changed or removed. Data Retention Bullet 6: this will be hard to do until the standard has been in place for several years. Data Retention Bullet 7: delete if R7 is rolled into R1
	Yes
	Yes
	Yes
	R1.2: The word "overview" seems to allow a lot of room and the measure (M1) does, too. However, when it comes to audit time, how specific might the auditor think it needs to be? R3: While ERCOT is the registered Transmission Operator in the region, it does not have direct control over the control facilities of all transmission operators and Qualified Scheduling Entities in ERCOT. ERCOT's Protocols and Operating Guides which require those entities to have and maintain backup facilities. Compliance with those requirements is monitored by ERCOT and the Texas Regional Entity. If ERCOT's Operating Plan would be considered to be in compliance based on references to such Protocol and Operating Guide requirements, rather than detailed provisions for each of the other entities, then this requirement is acceptable. Otherwise, it should be revised to accommodate such a method of compliance. R4 and R5: Is this just a way to say that there is no requirement to have a backup to the backup facility in the event that the primary control center functionality is lost? It also seems to say that when both primary and backup are available, the RC, BA and TO have to also have a Backup Control Center Facility. This requirement needs some simplified wording to make its intent more clear. Maybe using more than one sentence would help. R7: Should be part of R1 R8.3: add "as necessary" between "incorporated" and "in" R9: Why six months to provide something that should be in place all the time?
	Group
	MRO NERC Standards Review Subcommittee
	Joe DePoorter
	MGE
	Yes
	Yes
	Yes
	No
	M1, M2, M3, M6, states that Entites shall have a "dated, current, in force Operating Plan...", The SDT is placing a measurement that is not contained in the Requirement. M4, M5, M7, states that Entites shall provide "dated evidence...", The SDT is placing a measurement that is not contained in the Requirement.
	No
	R1, part of the Lower VSL category of non compliance is "...not dated with evidence of its last issue date.", this is not contained within any part of R1. The VSL Criteria Strawman Document sites that for procedues/programs, in the Lower Category, "The responsible entity has demonstrated the existence of required procedure/program but is missing minor details or minor program/procedural elements. Such deficiencies would not impact the achievement of the objective of the requirement." Recommend that "...not dated with evidence of its last issue date." be deleted from R1's VSL. R4, part of the Lower VSL category of non compliance is "...or the evidence of its demonstration is not dated.", this is not contained within any part of R4. The VSL Criteria Strawman Document sites that for procedues/programs, in the Lower Category, "The responsible entity has demonstrated the existence of required procedure/program but is missing minor details or minor program/procedural elements. Such deficiencies would not impact the achievement of the objective of the requirement." Recommend that "...or the evidence of its demonstration is not dated" be deleted from R4's VSL. R5, part of the Lower VSL category of non compliance is "...or its evidence is not dated.", this is not contained within any part of R5. The VSL Criteria Strawman Document sites that for procedues/programs, in the Lower Category, "The responsible entity has demonstrated the existence of required procedure/program but is missing minor details or minor program/procedural elements. Such deficiencies would not impact the achievement of the objective of the requirement." Recommend that "...or its evidence is not dated" be deleted from R5's VSL. R7, part of the Severe VSL category of non compliance states "...dated evidence shows that...", the word "dated" is not contained within any part of R7. R8, part of the Lower VSL category of non compliance is "...has provided evidence. such as dated records. that it has tested its dated.

	current, in force Operating Plan for backup functionally, with evidence of its last issue, through actual implementation..." If an Entity accomplished this they would BE compliant. Perhaps the SDT forgot to add a deficiency (negative aspect) to a minor detail within the VSL. Overall it seems that the SDT has been directed to place some sort of "date (d)" qualifier within the VSLs. If there is another document that is directing this (i.e., Generally Accepted Government Accounting Standards?), it would be helpful to the Utility Industry of what that document is. VSLs should be a direct reflection of the Requirements.
	Yes
	Yes
	R1, Requires that applicable entities have an Operating Plan covering "backup functionality". Then R1.1 uses "backup functionality" as a sub-requirement to R1, without explaining what "backup functionality" is. Would a Balancing Authority's backup functionality be all NERC requirements assigned to a Balancing Authority? Please define. R1.5, What happens if the applicable entity needs more than two hours to get "backup functionality" running? R1.6.2, Does "...as well as during outages of the primary/backup functionally" include SCADA, Energy Managements Sysyems, ect, updates? Could the SDT clarify the maximum amount of time that updates, patches, maintenance could take place without harming the BES, such as within one hour? R2, states the Operating Plan is required to be " at the location supporting backup functionally". If this is the backup control center, the MRO agrees, if not please clarify. R4, The MRO believes this requirement is redundant and should be removed. The MRO believes that this requirement would put the RC in double jeopardy. Please clarify why R4 is written. R5, The MRO believes this requirement is redundant and should be removed. The MRO believes that this requirement would put the BA & TOP in double jeopardy. Please clarify why R5 is written.
	Yes
	The MRO commends the SDT. The SDT has incorporated many past comments and given great replies to the many questions, Thank you.
	Group
	ITC
	Debra Yinger
	International Transmission Company
	No
	The addition to 4.1.2 attempts to address what is really a registration and BES defintion issue. This is not the proper place to these issues. The applicability should be just to the TOP and any limitation to the scope of the TOP should be handled in registration.
	Yes
	No
	Per comments made elsewhere, requirement 6 should be part of requirement 1 and therefore have a Medium VRF.
	No
	Suggest replacing the words "current, in-force" with "approved" for clarity in several of the Measures. The implication of "approved" is that an auditor would be able to see a signature of approval of the Plan. Measure 7 evidence would not be easy to provide since you trying to prove a negative - that you don't do something. An auditor could not practically verify that the technical backup capability does not depend on the primary control center. Per comments elsewhere, the associated requirement should be removed and defer to requirement 1.
	No
	The VSLs for Requirement 3 don't make any sense. Per comments elsewhere, this requirement should be re-written to focus on delegated functions. It is unlikely multiple entities would be involved as implied in the VSLs. For requirement 4 and 5, the VSL would be nearly impossible to calculate or measure from a practical standpoint. The VSL should not be focussed on the number of other Standards that would be violated, but on the Plan itself or the functions. For requirement 7, the only VSL (severe) does not make any sense, further evidence that the requirement itself is not appropriate, as commented elsewhere. For requirement 8, the drafting team should develop VSLs for all levels, similar to requirement 1.
	Yes
	Yes
	Requirement 3 should be re-worded to "Each applicable Transmission Operator "delegating" BES "operational functions to" other entities... At any given time, the TOP may 'direct' any connected GOP or LSE to take an action




































	<p>to support BES operations. As written, this requirement could be interpreted to require the TOP to have the backup plan for all connected GOPs, LSEs, etc. incorporated into their plan. Limiting the scope to those functions which are formally delegated is more appropriate and reasonable. Requirement 4 and 5 should be reworded. The requirement is cumbersome to read and understand. We believe the intent of the phrase "during the time period when the primary control center functionality and the backup functionality are both available for use" is intended to clarify that if you are already at your backup, you are not required to have a second N-2 backup. We suggest you add a sub-requirement that clearly states this exclusion and remove the phrase from the main requirement. Requirement 6 should be a sub-requirement of requirement 1 and requirement 6 and 6.1 should be combined into a single requirement that says the plan must be updated annually OR within 60 days of any significant changes. Requirement 7 is unnecessary and ambiguous. Requirement 1 adequately addresses the specific requirements of the Plan. Requirement 9 should be modified. If extended operation from a backup facility is a real concern to reliability, the RE should not be waiting 6 months to know there is an alternative plan. If it's OK to wait 6 months, this requirement should be removed.</p>
	Yes
	Individual
	Paul Rocha
	CenterPoint Energy
	No
	<p>CenterPoint Energy believes the applicability should not include the vague, fill-in-the-blank provision of "...or Facilities demonstrated by the Regional Entity to be critical to the reliability of the Bulk Electric System." This provision leaves it open to the whim of a Regional Entity to conjure some rationale to "demonstrate", by whatever means, that these requirements should apply to an otherwise exempt entity. Adding to the vagueness of the language is that it is not clear to whom the Regional Entity would make such a "demonstration". If the Regional Entity "demonstrates" the alleged criticality to itself, the problems with the proposed language should be self-evident to even the most naïve proponent. Even if the "demonstration" is to an independent, competent, and trustworthy third party (all of which cannot be assumed without specificity of who the independent third party would be), it is unclear what due process is afforded to otherwise exempt entities to argue the facts asserted by the Regional Entity and to argue the reasonableness of the vague, undefined "demonstration" criteria used by the Regional Entity to make its assertion of criticality to the reliability of the BES. CenterPoint Energy recommends that this vague, fill-in-the-blank provision be deleted.</p>
	No
	<p>CenterPoint Energy believes this standard will likely deliver a more than adequate level of reliability. Some might argue that more than adequate reliability is always good. However, CenterPoint Energy disagrees with a one-sided view that ignores cost considerations. If more than adequate reliability can be delivered for minimal cost, then such a level of reliability is certainly in the public interest. However, if more than adequate reliability comes at a significant cost, then a balanced view that weighs costs and benefits would better serve the public interest. Specifically, CenterPoint Energy believes R1.3 is unnecessary and could have unintended consequences. R1.2 outlines the requisite backup functionality, rendering R1.3 unnecessary. Given the infrequency with which loss of primary control center functionality occurs (due to the redundancy and hardening of such facilities), it is unnecessary and probably not cost-effective for backup control center functionality to be consistent with the primary control center. Some reduced backup functionality, that still meets the requirements of R1.2, is probably the most cost-effective approach in most circumstances to ensure adequate reliability in the infrequent circumstance of the loss of primary control center functionality. Furthermore, R1.3 could have the unintended consequence of entities choosing not to voluntarily exceed the minimum required functionality of the primary control center because R1.3 essentially doubles the cost of any discretionary upgrade to the primary control by mandating that the backup facility maintain the same discretionary functionality. Moreover, the primary control center may have functionality unrelated to reliability considerations, such as market-related functionality, that arguably would need to be provided by the backup control center under R1.3. Backup functionality unrelated to reliability considerations should not be mandated by reliability standards but instead should be left to individual entities and their market stakeholders to decide. For all these reasons, CenterPoint Energy believes R1.3 should be deleted. Furthermore, CenterPoint Energy recommends that the SDT consider modifying R4 and R5 to specify that backup functionality be sufficient to comply with all medium or higher VRF requirements. Again, given the</p>



	infrequency of loss of primary control center events, the most cost-effective approach to ensure an adequate level of reliability for backup control center functionality is probably to not require the lower VRFs to be maintained in such rare circumstances. When considering this recommendation, it might be helpful to remember that control centers operated reliably for years before the version 0 and beyond NERC standards without all the functionality now available and now required by NERC standards. Generally, such reliability was accomplished through more conservative operation. More conservative operation has costs usually in terms of inefficient generation dispatch. However, an entity may find that rare instances of inefficient generation dispatch due to conservative operation by a backup facility might be less costly than the on-going costs to retain full backup capability to meet all the NERC requirements, even the lower VRF requirements.
	Individual
	Greg Ward / Darryl Curtis
	Oncor Electric Delivery
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	No
	Yes
	Individual
	Robert Temple
	Western Area Power Administration
	No
	Please define radial/non-radial; Is the definition radial to load, radial to generation, radial to both load and generation?
	Yes
	Yes
	No
	These measures should be consistent with other existing data retention measures that have already been approved (3 years worth of data). Suggestion is to have the current year and two previous years worth of data.
	No
	Suggestion is to apply percentage levels to requirements as opposed to percentage levels to standards (as this is currently written).
	Yes
	Yes
	Requirement #1.6.2; Change "Actions to manage the risk..." to "Actions to manage the impact..." Requirement #3; Please specify the meaning of "...directing BES operations through other entities..." What does through other

	<p>entities mean? Requirement #5; "during the time period when the primary control center functionality and the backup functionality are both available for use, have backup functionality..." This statement is very vague and implies having two control centers in operation at all times. This sentence needs to be rewritten. Requirement #5; "maintaining compliance with all Reliability Standards..." is too vague. Please specify the Reliability Standards required for compliance. Requirement#6.1; Timing on an updated Operating Plan is vague. A suggestion is to state the updated Operating Plan should be within 12 months from the last update. Requirement #8.3; Lessons learned should not be included in the Operating Plan. A suggestion is to have the lessons learned as evidence resulting from the tests.</p>
	No
	Without understanding the implications regarding some of the vague wording on this draft, constructive comments cannot be provided.
	Individual
	Kathleen Goodman
	ISO New England Inc
	No
	<p>We agree with the drafting team's intent to eliminate the burden on a Transmission Operator that just has a radial connection to the BES under 200 kV by limiting TOP applicability. However, this is a registration issue and really identifies an issue with the definition of the BES. A standard is not the proper place to address registration and BES definition issues. The applicability should be just to the TOP and any limitation should be handled in registration. TOPs operating only radial transmission lines serving load are already excluded from registering per Section 501 sub-section 1.2.3 of the NERC Rules of Procedure. Limiting applicability further than this on radial transmission lines in essence redefines the BES and that is not a function of a standard. Please remove the language limiting the applicability.</p>
	Yes
	No
	<p>We agree with the VRFs for R1 to R8 but not R9. We assess the reliability impact of (R9) failure to come up with a plan 6 months after an entity has experienced a loss of its primary control center or backup capability and expects such loss to last for 6 months or more is lower than any of the other requirements that are assigned a Medium VRF. We therefore suggest a Lower be assigned to this requirement.</p>
	No
	<p>We do not agree with some of the requirements (see our comments under Q7) and hence some Measures may need to be revised if the SDT agrees with any of our suggested changes to the requirements.</p>
	No
	<p>(i) R2: It requires a copy of the plan be provided at both the primary and backup facilities. Failing to provide any copy at all is a complete violation of the requirement and hence should be assigned a Severe VSL, not Medium (note that VSL is a measure of the extent to which a requirement is not met, not its impact). We therefore suggest to move the two conditions from Low/Medium to High/Severe in accordance with established VSL guidelines. (ii) R4: The Severe level should include a condition that the RC provides less than 70% of the functionality required for maintaining compliance with the Reliability Standards applicable to an RC. Otherwise, there will not be any VSL for RC providing functionality sufficient for maintaining compliance with, say, 40% of the Reliability Standards. Further, the proposed wording change, i.e., &lt;70%, covers the condition of not having any functionality at all to comply with reliability standards. (iii) R5: Same comment as in (ii) except the entities are the BAs and applicable TOPs. (iv) R6: There are no VSLs assigned to High and Severe. We suggest the SDT to provide the conditions that an entity fails to meet the bulk of the intent of this requirement (High) and fails to meet this requirement completely (Severe). For example, a High VSL can be assigned if the entity did not review and if necessary update its plan after 18 months, or 120 calendar days after changes were made to the backup capability; a Severe for failing to review and if necessary update its plan for a longer time period or not at all.</p>
	Yes
	Yes
	<p>R3: It stipulates that "Each applicable Transmission Operator directing BES operations through other entities shall include provisions for the loss of such entity's control functionality in its Operating Plan for backup functionality." We do not agree that this requirement applies to the TOP only. There might well be situations that an RC or a BA directs it operations through other entities as well. We suggest the requirement to also include the RC and the BA by rewording to: "Each Reliability Coordinator, Balancing Authority and applicable Transmission Operator directing BES operations..." R4: We are not sure why the condition: "...during the time period when the primary control center functionality and the backup functionality are both available for use..." is included since having both control</p>

	center functionalities available for use suffice to meet the condition for: "...have a backup control center facility (provided through its own dedicated backup facility or at another entity's control center) that provides the functionality required for maintaining compliance with all Reliability Standards applicable to the Reliability Coordinator." If the intent of this requirement is to ensure the functionality works, then the requirements should simply stipulate such a demonstration. In fact, the intent of R8 is to ensure that the backup capability is functional when called upon. We therefore hold the view that R4 (and R5) is not needed. R5: Please see our comments on R4. We do not think R5 is needed. If retained, the wording should be changed to require a demonstration of the backup capability's functionality. R7: We do not see the need for this to be a stand alone requirement. This requirement can be included as one of the sub-requirement in R1, or even combined with R1.3.
	Yes
	Backup functionality for RCs, BAs and applicable TOPs are essential to ensuring continuous reliable operation of the BES. This standard is needed to provide this assurance.
	Individual
	Dan Rochester
	Independent Electricity System Operator
	Yes
	
	Yes
	
	Yes
	We agree with the VRFs for R1 to R8 but not R9. We assess the reliability impact of (R9) - that failure to come up with a plan 6 months after an entity has experienced a loss of its primary control centre or backup capability and expects such loss to last for 6 months or more - is lower than any of the other requirements that are assigned a Medium VRF. We therefore suggest a Lower VRF be assigned to this requirement.
	Yes
	We do not agree with some of the requirements (see our comments under Q7) and hence some Measures may need to be revised if the SDT agrees with any of our suggested changes to the requirements.
	No
	(i) R2: It requires a copy of the plan be provided at both the primary and backup facilities. Failing to provide any copy at all is a complete violation of the requirement and hence should be assigned a Severe VSL, not Medium (note that VSL is a measure of the extent to which a requirement is not met, not its impact). We therefore suggest to move the two conditions from Low/Medium to High/Severe in accordance with established VSL guideline. (ii) R4: The Severe level should include a condition that the RC provides less than 70% of the functionality required for maintaining compliance with the Reliability Standards applicable to an RC. Otherwise, there will not be any VSL for RC providing functionality sufficient for maintaining compliance with, say, 40% of the Reliability Standards. Further, the proposed wording change, i.e., <70%, covers the condition of not having any functionality at all to comply with reliability standards. (iii) R5: Same comment as in (ii) except the entities are the BAs and applicable TOPs. (iv) R6: There are no VSLs assigned to High and Severe. We suggest the SDT to provide the conditions that an entity fails to meet the bulk of the intent of this requirement (High) and fails to meet this requirement completely (Severe). For example, a High VSL can be assigned if the entity did not update its plan after 18 months or 120 calendar days after changes were made to the backup capability; a Severe VSL may be assigned for failing to update its plan for a longer time period or at all.
	Yes
	
	Yes
	R3: We have two comments on this Requirement: a. It stipulates that "Each applicable Transmission Operator directing BES operations through other entities shall include provisions for the loss of such entity's control functionality in its Operating Plan for backup functionality." We do not agree that this requirement applies to the TOP only. There might well be situations that an RC or a BA directs its operations through other entities as well. We suggest the requirement to also include the RC and the BA by rewording to: "Each Reliability Coordinator, Balancing Authority and applicable Transmission Operator directing BES operations..." b. We believe the wording is ambiguous in that in some areas/jurisdictions, there are multiple TOPs that one of them direct the operations of the other. For example, an ISO is registered as a TOP while a transmission entity (an owner, for example) within the ISO footprint is also registered as a TOP. The two TOPs perform distinctly different tasks and may even have their tasks and responsibilities clearly stipulated in an agreement, market rule or regional reliability plan. The ISO-TOP directs operations of the transmission-entity-TOP while the latter may be solely responsible for switching operations and maintenance. Both need to have backup capability. The way R3 is worded can be interpreted that

	<p>the ISO-TOP needs to be responsible for the backup capability of the transmission-entity-TOP. We do not believe this is the intent of R3, and this is not acceptable. To clarify this situation, we suggest R3 to be reworded to: Each applicable Transmission Operator delegating its tasks for BES operations to other entities shall include provisions for the loss of such entity's control functionality in its Operating Plan for backup functionality. In other words, this requirement only applies to a TOP if it delegates it task (for which it is still fully responsible) to another entity. R4: We are not sure why the condition: "...during the time period when the primary control center functionality and the backup functionality are both available for use..." is included since having both control centre functionality available for use suffice to meet the condition for: "...have a backup control center facility (provided through its own dedicated backup facility or at another entity's control center) that provides the functionality required for maintaining compliance with all Reliability Standards applicable to the Reliability Coordinator." If the intent of this requirement is to ensure the functionality works, then the requirements should simple stipulate such a demonstration. In fact, the intent of R8 is to ensure that the backup capability is functional when called upon. We therefore hold the view that R4 (and R5) is not needed. R5: Please see our comments on R4. We do not think R5 is needed. If retained, the wording should be changed to require a demonstration of the backup capability's functionality. R7: We do not see the need for this to be a stand alone requirement. This requirement can be included as one of the sub-requirement in R1, or even combined with R1.3.</p>
	Yes
	Backup functionality for RCs, BAs and applicable TOPs is essential to ensuring continuous and reliable operation of the BES. This standard is needed to provide this assurance.
	Individual
	Marty Berland
	Progress Energy-Florida
	Yes
	
	No
	<p>Transition Period – Different transition period requirements are needed in order to correlate with the various reasons that a primary control center can be lost. A blanket 2-hour requirement forces a backup site to be within approximately 60 - 90 miles of the primary site to cover the scenario of the quick loss ("crater") of the primary center, where offsite personnel must travel from a non-business location to the backup site. However, this distance is insufficient to protect against the loss of both the primary and backup centers due to a major storm, such as a hurricane. Either the transition period needs to be increased to 4 hours, or exceptions are needed for centers located in hurricane-prone areas. Clarification requested as to what constitutes "loss of primary control center functionality" and what constitutes "backup functionality up and running"? Is the functionality to mean at a minimum the aggregate abilities to monitor/maintain frequency, perform AGC, calculate ACE, and perform interchange scheduling (for BA's) and/or for TO's, the minimum aggregate abilities to monitor and control transmission system voltages, power flows, the switching of transmission elements, and ability to respond to IROLs and SOLs violations? Suggest better definition which would identify the minimum as being any one (or all) of the following: -- loss of ability to monitor and provide basic tie line control for maintaining the status of all inter-area schedules, -- loss of ability to monitor and control critical transmission facilities, generation control, voltage control, time and frequency control, control of critical substation devices, and logging of significant power system events. -- loss of ability to maintain basic voice communication capabilities with other areas.</p>
	Yes
	
	No
	<p>What is purpose of requiring Operating Plans to be retained for prior 3 years? It should be satisfactory to maintain current active plan with retention revisions of last full calendar year unless there has been a compliance violation identified by the Regional Compliance entity. R8 – Does a test in January of one year followed by a test in December of the following year meet the requirement of an "annual" test? If not, the wording here should match Violation Security Levels section D.2.R8. M5 – Does this require a document detailing each requirement of all Reliability Standards along with a description of how each is satisfied at the backup (similar to an audit response)? If not, what else can satisfy this measure? M7 – Does this require a document detailing each requirement of all Reliability Standards along with a description of how it is satisfied at the backup (similar to an audit response) without utilizing equipment at the primary? If not, what else can satisfy this measure? D.1.4, 5th bullet (related to M5) – Does this require a demonstration of adequate backup functionality to be repeated and documented at least once between compliance audits? This measure is not needed since R8/M8 requires an annual test with documentation. D.2.R8, Lower Level – States that a violation occurs if subsequent tests occur more than 12 months apart. Section B.R8 states that an annual test shall be conducted. Unless the term "annual" is defined as "every 12 months" in a reference document, these descriptions must match.</p>
	No

	Reference section D.2 Violation Severity Levels R5 -- there are specific percentages stated therein, how are they calculated? Is it per standard or per individual requirement and sub-requirements?
	No
	Effective Date – 24 months is not adequate time to address such a significant change in requirements from EOP-008-0. The requirement is changing from a recovery plan to a hot-standby backup available within 2 hours. Additional time is needed to choose a backup methodology, budget accordingly, purchase/construct a backup site (or negotiate with another entity, though the feasibility of this is questionable), design backup voice and data communications, and implement – all per CIP requirements while upgrading existing primary equipment/facilities to meet CIP requirements with implementation schedules through 2010. This requires multi-million dollar actions that must be addressed with a methodologically sound approach to avoid rework and undue financial burden. PEF suggests an implementation period of 1) 36 months for Substantial Progress (i.e. groundbreaking) and 2) 48 months for full implementation.
	Yes
	R5 – Compliance with all Reliability Standards should not be required immediately upon transition to the backup. The focus at immediate transition must be solely upon standards directly-related to essential BES reliability. This is evidenced within this standard by choosing an annual test only lasting 2 hours, which will only verify the basic functionalities of SCADA, alarming, voice & data communications, AGC, state estimator and contingency analysis. The requirement to immediately meet all standards causes undue time/finances to be spent on hot-backup technology for non-essential functions, and thus decreases attention to essential functions. Non-essential standard requirements such as inadvertent/interchange check-outs, TTC/ATC postings, transaction tagging, etc should be identified, and a longer transition requirement specified, such as 48 hours. R7 – How does this apply to a situation where primary EMS or voice communication equipment resides in a facility geographically separate from the primary center's control room? Does the phrase "does not depend on the primary control center" refer to the control room facility only, or does it also apply to the facility housing EMS/voice communication equipment? What distinguishes equipment for compliance to this standard versus CIP-009-1?
	Yes
	Group
	Pepco Holdings, Inc. - Affiliates
	Richard Kafka
	Pepco Holdings, Inc.
	Yes
	Yes
	Yes
	Yes
	No
	R2 - need to recognize there may be more than one backup facility - wording implies one primary facility and one backup facility. R3 has increments on number of entities rather than number of BES facilities. Concentrating on entities does not address the real issue. R4 and R5 concentrate on percentage of standards met by relying on backup facility rather than number of facilities still under monitoring and control.
	Yes
	Yes
	The requirements should be modified to recognize that duplicate and separate EMS facilities running in parallel without dependence on each other fulfill the need for backup facilities.
	Yes
	Operative word is -help- see previous comments
	Group
	Santee Cooper

	Terry L. Blackwell
	South Carolina Public Service Authority
	No
	In 4.1.2 (Applicability) it is not clear that it is for a radial connection to the BES under 200 kV. There could be differences in what a regional entity deems critical to the reliability of the BES and what a TOP deems critical to the reliability of the BES. Would this allow a Regional Entity to require a TOP with radial facilities deemed critical by the RE to have a backup control center? Suggestion for rewording of 4.1.2: Transmission Operator .... or radial facilities under 200 kV demonstrated by the Regional Entity to be critical to the reliability of the BES.
	No
	We recommend that R1.5 be changed such that the backup plan be implemented in less than two hours and the backup functionality up and running that is less than three hours. Smaller entities that need a larger physical separation between control centers will need at least three hours to get backup functionality up and running.
	Yes
	Yes
	Yes
	Yes
	No
	No
	We believe with our comments from above included in the standard, that this standard will help deliver an adequate level of reliability.
	Individual
	Rao Somayajula
	ReliabilityFirst Corporation
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	In R1.3, I am not sure what "Operating Process" means. I am thinking may be you can say "Back-up Control Facility Opearting guide". Also suggest replacing "backup funtionality" with "backup contro funtionality". I feel this conveys the intent better.
	Yes
	Group
	Bonneville Power Administration









	Denise Koehn
	Transmission Reliability Program
	Yes
	Yes
	Yes
	Yes
	Yes
	No
	Yes
	Individual
	David Carpenter
	Brazos Electric Power Cooperative, Inc.
	No
	This new definition basically brings in all TO's that operate transmission lines 100 kV and above given the NERC definition of a Transmission Operator (The entity responsible for the reliability of its 'local' transmission system...) and the emphasis now on Facilities. This new applicability is much broader than the original version and does not eliminate any burden on TO's, it could in fact be quite the opposite. The new applicability does not seem to match the intent of the old language. Taken literally this means that almost all TO's in ERCOT must have a backup control center. In the past we viewed this Standard applied to ERCOT, the one who directs the operation of the BES, not just a 'local' area. If the intent is to require more TO's to have backup control centers we are against this new concept because of the very small probability of ever losing the primary control center. As this happens so infrequently we feel it is not in the best interest of the electric customers to provide something that will have little benefit or any benefit ever. However, if this standard can be assigned to an entity such as ERCOT by each TO to which this applies then we can accept that concept but not all the new language. The last part of 4.1.2 is ambiguous in several ways. How are Facilities 'demonstrated' to be Critical and to whom and under what criteria? This language is not well thought out. The old 4.1.2, while not great, was better than the new one. The use of the word 'control' leads us to believe that the TO who has the final authority or 'control' of the facilities (small 'f', not capital 'F' for facilities), should have the backup control center and thus we assumed this to be ERCOT. We see no reason for this to change.
	No
	It seems excessive to retain each and every change to these documents and to note that they be 'an approved' plan. We think more emphasis should be placed on having the backup and demonstrating its readiness instead of worrying about documenting everything. No real suggestion for improvement other than to remove some of the unnecessary documentation burdens and language. Perhaps just delete all the lower risk items.
	Yes
	No
	We believe this standard to be excessive if the intent is as stated above to have all TO's have a backup control
























	center.
	Individual
	Greg Mason
	Dynegy
	Yes
	Yes
	Yes
	No
	Yes
	Individual
	Roger Champagne
	Hydro-Québec TransÉnergie (HQT)
	No
	The addition of the wording "operating Facilities at 200 kV or above, or non-radial Facilities above 100 kV," is not appropriate and should be removed.
	No
	In the previous version of the Standards, the TOP and BA had a leeway for interim provisions to be included in the plan when extenuating circumstances cause the transition to take longer than two hours (See R8.1 and R8.2 in the redline version). HQT asked to have a similar leeway for the RC. In the current version, that leeway has been removed for all of them. In the answers provided by the SDT, it seems that they assume that facilities for the RC are in another location than that of the BA and TOP. While this might be true for others, for HQT they are all in the same location. HQT propose that that a bullet be added in R1.6.3 that reads: "Interim provisions must be included in the plan when extenuating circumstances cause the transition to take longer than two hours for the RC, TOP and BA"
	No
	We agree with the VRFs for R1 to R8 but not R9. We assess the reliability impact of (R9) failure to come up with a plan 6 months after an entity has experienced a loss of its primary control center or backup capability and expects such loss to last for 6 months or more is lower than any of the other requirements that are assigned a Medium VRF. We therefore suggest a Lower be assigned to this requirement.
	No
	We do not agree with some of the requirements (see our comments under Q7) and hence some Measures may need to be revised if the SDT agrees with any of our suggested changes to the requirements.
	No
	(i) R2: It requires a copy of the plan be provided at both the primary and backup facilities. Failing to provide any copy at all is a complete violation of the requirement and hence should be assigned a Severe VSL, not Medium (note that VSL is a measure of the extent to which a requirement is not met, not its impact). We therefore suggest to move the two conditions from Low/Medium to High/Severe in accordance with established VSL guidelines. (ii) R4: The Severe level should include a condition that the RC provides less than 70% of the functionality required for maintaining compliance with the Reliability Standards applicable to an RC. Otherwise, there will not be any VSL for RC providing functionality sufficient for maintaining compliance with, say, 40% of the Reliability Standards. Further, the proposed wording change, i.e., <70%, covers the condition of not having any functionality at all to comply with reliability standards. (iii) R5: Same comment as in (ii) except the entities are the BAs and applicable TOPs. (iv) R6: There are no VSLs assigned to High and Severe. We suggest the SDT to provide the conditions that an entity fails to meet the bulk of the intent of this requirement (High) and fails to meet this requirement completely (Severe). For example, a High VSL can be assigned if the entity did not review and if necessary update its plan after 18 months.

	or 120 calendar days after changes were made to the backup capability; a Severe for failing to review and if necessary update its plan for a longer time period or not at all.
	Yes
	Yes
	R3: It stipulates that "Each applicable Transmission Operator directing BES operations through other entities shall include provisions for the loss of such entity's control functionality in its Operating Plan for backup functionality." We do not agree that this requirement applies to the TOP only. There might well be situations that an RC or a BA directs it operations through other entities as well. We suggest the requirement to also include the RC and the BA by rewording to: "Each Reliability Coordinator, Balancing Authority and applicable Transmission Operator directing BES operations..." R4: We are not sure why the condition: "...during the time period when the primary control center functionality and the backup functionality are both available for use..." is included since having both control center functionalities available for use suffice to meet the condition for: "...have a backup control center facility (provided through its own dedicated backup facility or at another entity's control center) that provides the functionality required for maintaining compliance with all Reliability Standards applicable to the Reliability Coordinator." If the intent of this requirement is to ensure the functionality works, then the requirements should simply stipulate such a demonstration. In fact, the intent of R8 is to ensure that the backup capability is functional when called upon. We therefore hold the view that R4 (and R5) is not needed, be eliminated, and include the required clarifications in the Measures Section. R5: Please see our comments on R4. We do not think R5 is needed. If retained, the wording should be changed to require a demonstration of the backup capability's functionality. R7: We do not see the need for this to be a stand alone requirement. This requirement can be included as one of the sub-requirement in R1, or even combined with R1.3. In regard to R7, we would appreciate the SDT to indicate if the EMS system should be doubled also at the Backup facility since R7 specifies that the Backup "does not depend on the primary control center for any functionality required to maintain compliance with Reliability Standards."
	Yes
	Group
	PJM Interconnection
	Tom Moleski
	PJM Interconnection
	No
	In 4.1.2, the SDT creates a new class of TOP. This is beyond the Scope of the Standard. 4.1.2 can only apply to current functional entities.
	No
	The transition timeframe should be defined and justified by the respondent, and be made part of their Operating Plan.
	Yes
	No
	Changes need to be made to address the primary/backup language (see 7 below). Additionally, data retention requirements are far too voluminous. There should only be one version (current) in the Control Center. Requiring 3 years worth of outdated plans in the control room, accessible to the operators, may result in mis-operations.
	No
	Changes need to be made to address the primary/backup language (see 7 below)
	Yes
	No
	PJM's concerns center on the basic premise of the standard; that there is one "primary" facility, and one "backup" facility. With the completion of our Business Continuity plan, PJM will be operated simultaneously from our existing control center, and another fully staffed, redundant center at a remote location (neither facility will be designated "primary" or "backup"). In the event of the loss of one of these facilities, this type of operation will accommodate an instantaneous transfer of all control to the redundant center. For this reason, PJM would like to propose the following addition to the applicability section of the standard 4.2. EOP-008-1 shall not apply to Reliability Coordinators, Transmission Owners, or Balancing Authorities that operate two equal, real-time facilities. at

	<p>geographically diverse sites, either of which is capable of operating as a stand alone, fully functional data center and control center. PJM feels that this type of redundant operation goes far beyond the requirements in the current standard, to ensure continued reliable operations of the Bulk Electric System (BES) in the event that a control center becomes inoperable. The very narrow exemption provided in the proposed addition is the cleanest, simplest way to accommodate this scenario. If the SDT does not agree to the proposed addition to the applicability section, PJM's representative will deliver a redline version of the current draft of the standard to the group at their next meeting. This will have a requirement by requirement, measure by measure, list of all the changes that allow for this type of redundant operation to meet all compliance scrutiny. A copy of this document has been forwarded to Ed Dobrowski of the NERC office. Beyond this PJM submits the following for consideration: In Applicability 4.1.2, the SDT creates a new class of TOP. This is beyond the Scope of the Standard. 4.1.2 can only apply to current registered entities. PJM would like to strike "allow visualization capabilities that" in R1.2.1. Tools for visualization are not in the requirements for any primary control center. Seems inappropriate to be in the requirements for a backup. Suggest changing R1.2.5 to read "All applicable NERC CIP Standards Suggest adding "unless this change is functionally transparent to the users" to the end of R1.6.1. PJM is aware of several Local Control Centers that have telephone &amp; data switching that is done by a central station. No contact information changes, and the caller should be indifferent to the physical location of the receiver. R3 would require TOPs directing BES operations through other entities to be accountable for the compliance of all of these entities. If this is the intent of the SDT, the Applicability section of the standard needs to be modified to include Transmission Owners (TOs) in lieu of defining other applicable entities in R3. In R5, Monitoring, control, logging, and alarming should all be sub-bullets of R5 (as done in R1.6 "Process shall include")</p>
	No
	No, not as currently drafted. These comments are extensive, and address nearly every requirement and measure. A thorough re-write of the Standard will be necessary before this can go to ballot.
	Individual
	Thad Ness
	AEP
	No
	"Facilities demonstrated by the Regional Entity to be critical to the reliability of the Bulk Electric System (BES)" needs to be clearly defined. Each regional entity must have a documented process for defining critical facilities.
	Yes
	The extended transition period increases the criticality of R1.6.
	Yes
	Yes
	Yes
	Yes
	No
	Yes
	The two hour requirement (between the loss of primary control center functionality and the time to fully implement the backup plan and get backup functionality up and running) is a more attainable goal. The transition period is addressed in R1.6. With the extended transition period, R1.6 could be expanded to address reliability concerns during the transition.
	Individual
	Jeff Hackman
	Ameren
	No
	We agree with the drafting team's intent to eliminate the burden on a Transmission Operator that just has a radial connection to the BES under 200 kV by limiting TOP applicability. However, this is a registration issue and really identifies an issue with the definition definition of the BES. A standard is not the proper place to address registration and BES definition issues. The applicability should be just to the TOP and any limitation should be

	<p>handled in registration. TOPs operating only radial transmission lines serving load are already excluded from registering per Section 501 sub-section 1.2.3 of the NERC Rules of Procedure. Limiting applicability further than this on radial transmission lines in essence redefines the BES and that is not a function of a standard. Please remove the language limiting the applicability.</p>
	<p>Yes</p>
	
	<p>No</p>
	<p>R7 should be a sub-requirement of R1. Thus, it should not have a VRF. The VRF for R8 should be lower. Given that the Operating Plan needs to be tested more frequently than annually to ensure that the backup capability is available when it is needed, this requirement is clearly intended to be administrative. Requirement 9 should be removed from the standard. This is, in essence, is a requirement for an N-2 contingency. It is such a rare occurrence to operate from a backup center for an extended period of time that this requirement is not needed. If the RC, TOP or BA must operate from their backup center or utilizing their backup capability for an extended period of time, they should work with NERC and the Regional Entity to address the specific situation rather than having a requirement that dictates a time frame.</p>
	<p>No</p>
	<p>Measures 1, 2, 3, 6, and 8 require dated, current, in force Operating Plan but there is no time requirement in the associated requirements. Measures should not add to the requirements. What does current really mean? How would the compliance auditor know if the Operating Plan is current given that the requirement does not mention date or time? We suggest removing the term in force because it does not add anything to the requirement. Why would the responsible entity supply an Operating Plan to the compliance auditor that wasn't in force? Measures 1, 2, 3, 6, and 8 also state that evidence of the last issue of the Operating Plan is required. There is nothing in the associated requirements about issuing. Thus again the measures are adding to the requirements but should not. To who is the Operating Plan required to be issued in the Measures? Part of the issue with Measure 6 is that its associated requirement really should be a sub-requirement of requirement 1. This would solve some of the issues with Measure 1. A large part of the issue with Measures 2, 3, 6, and 8 appear to be overuse of copy and paste. The only requirement associated with these measurements that really needs a dated Operating plan as evidence is requirement 1 but as the requirement is currently written it does not require the Operating Plan to have a date. Measure 7 should not include a requirement for dated evidence. What is really needed is that the Operating Plan evidence presented should have a date and the Operating Plan should be verified to not depend on the primary control center. The compliance auditors could not practically verify that the backup capability or backup control center does not depend on the primary control center. Thus, the requirement associated with Measure 7 is really a sub-requirement of requirement 1. Measurement 9 should not require the RC, BA, and TOP to have evidence that a plan has been submitted to its Regional Entity when it loses its primary control center or backup capability or backup control center because the Regional Entity is the Compliance Enforcement Authority. The Regional Entity will know when the plan is received.</p>
	<p>No</p>
	<p>Guideline 3 of FERC's order conditionally approving VSLs for the original 83 regulatory approved standards stipulates that the VSL should not add to the requirement. The Lower VSL of R1 does add a requirement for the document to be dated which violates Guideline 3. Requirement 1 fits the multi-component category of the VSL Guidelines. This category puts the number of sub-requirements that are missing from the Operating Plan into quartiles. Thus, the Lower VSL would be missing one or two sub-requirements the Moderate VSL would be missing three or four sub-requirements the High VSL would be missing five to six sub-requirements and the Severe VSL would be missing seven sub-requirements or the plan would not exist. The VSLs for Requirement 2 should use the term back-up capability along with primary control center for consistency with the requirements. We agree with these levels. The VSLs for Requirement 3 really don't make any sense. It implies there may be more than one other entity that a TOP is directing BES operations through. We don't think that this is likely. Additionally, the VSLs as written do not seem to fit any category within the VSL guidelines document. Why would the VSLs not be divided into quartiles? For the requirement 4, the Lower VSL violates FERC's guideline 3 established in their order conditionally approving VSLs since the VSL indicates a date which is not in the requirement. Additionally, the VSLs do not consider most of the range of possibilities foreseen by the drafting team. For example, compliance with 83% of the reliability standards does not fit any VSL. Review of these VSLs cause us to question if the associated requirement needs to be modified. If the requirement is that the BA or TOP has a backup capability plan, isn't the BA or TOP still required to comply with all other reliability standards? Thus, why does the requirement need to explicitly state this. Doesn't this present an opportunity for double jeopardy? For the requirement 5, the Lower VSL violates FERC's guideline 3 established in their order conditionally approving VSLs since the VSL indicates a date which is not in the requirement. Additionally, the VSLs do not consider most of the range of possibilities foreseen by the drafting team. For example, compliance with 83% of the reliability standards does not fit any VSL. Review of these VSLs cause us to question if the associated requirement needs to be modified. If the requirement is that the RC has a backup control center, isn't the RC still required to comply with all other reliability standards? Thus, why does the requirement need to explicitly state this. Doesn't this present an opportunity for double jeopardy? Perhaps the drafting team should consider applying VSLs based on if monitoring, control, loading and alarming are included</p>















	<p>in the backup capability. In its order approving VSLs, the FERC stated in paragraph 27 that they prefer graded VSLs whenever possible. For requirement 6, we believe a VSL could be written for each severity level using the time requirements established. For instance, high could apply to 18 months and severe to 21 months. Additionally, the VSLs for requirement 6 violation FERC's guideline 3 by requiring the Operating Plan to be dated. The associated requirement does not mention dating. For requirement 7, the only VSL does not make any sense. The VSL implies that the responsible entity may provide evidence that backup plan depends on the primary control center. Why would the responsible entity providing evidence of non-compliance be a severity level? The purpose of providing evidence is to demonstrate compliance. Is this requirement 7 even needed? There are requirements in this standard that require a backup plan. The responsible entity is responsible to comply with this standard and with all other standards even when operating with the backup plan. Can they comply with other standards if the backup plan depends on the primary control center and the primary control center is destroyed? No. Thus, they would violate many other standards. Thus, requirement 7 is implied and not needed explicitly as a requirement. For requirement 8, we do not support a mandatory testing time of two hours or a transition time of two hours. However, considering the requirement as written, we suggest the drafting team could develop VSLs for all levels. VSLs could be written as: Lower: Tested the back plan for less than 30 minutes or The transition time was more than two hours but less than or equal to 3 hours or the test results and lessons learned were not incorporated in subsequent revisions. Moderat: Tested the backup plan for 30 minutes or more but less than one hour The transition time was more than three hours but less than or equal to four hours. High: Tested the back plan for one hour or more but less than 90 minutes or The transition time was more than four hours but less than or equal to five hours. Severe: Tested the back plan for 90 minutes or more but less than two hours or The transition time was more than five hours. For requirement 9, the VSL perpetuates some of the problems that are currently occurring with compliance monitoring of requirements that have periodic reporting requirements to the Regional Entity. The Regional Entity either already has the evidence or a violation has occurred because the report was not submitted on time. The responsible entity should not have to redemonstrate to the compliance auditor that it submitted the plan to the Regional Entity since the compliance auditor is the Regional Entity.</p>
	Yes
	
	Yes
	<p>Requirement 2 is not needed. What is important is that the plan gets implemented when needed not that some compliance auditor can verify there is a copy of the plan at the backup and primary control centers. Most entities are going to have their plans at the primary and backup control centers to allow them to implement the plan. If they don't, they likely won't be able to implement their plan in the required time frame. Thus, they will already be violating another requirement so lets not provide an opportunity for double jeopardy. Requirement 4 should strike "that provides functionality required for maintaining compliance with all Reliability Standards applicable to the Reliability Coordinator". The RC is already required to comply with these standards regardless of whether they operate from the backup center or the primary center. Requirement 5 should strike "sufficient for maintaining compliance with all Reliability Standards applicable to a Balancing Authority or Transmission Operatore respectively". The BA and TOP are already required to comply with these standards regardless of whether they operate from the location of their backup capability or the primary center. Further, we urge the drafting team to consider combining requirements 4 and 5 to require full backup control centers for the TOP and BA as well as the RC. Requirement 5 is already stringent enough that a backup control center is likely required anyway. Combining the requirements just simplifies the standards. Requirement 6 is really a sub-requirement of requirement 1. Sub-requirement 6.1 is confusing. Because it is a sub-requirement, it must apply to requirement 6. Thus, it would seem that the sub-requirement is requiring the annual review and approval to occur withing 60 days of any changes. What if there are multiple changes in the year? From this perspective, it appears that the sub-requirement is intended to reflect that changes can occur at any time. To clarify the requirement, we suggest the following language as a sub-requirement of R1 along with striking requirement 6 and 6.1: "Each RC, BA an TOP shall review and approve its Operating Plan for backup functionality annually and within sixty calendar days of any changes to the backup location, capabilities or contact information, modify the Operating Plan to reflect the changes." Requirement 7 is unnecessary as an explicit requirement. Each RC, TOP and BA is required to comply with all applicable requirements even if they are operating from the location of their backup functionality or backup control center. If their backup functionality relies on the primary control center, the RC, TOP and BA will be unable to comply with numerous other requirements in the event that they lose the functionality of their primary control center. Requirement 8 is not needed and does not accomplish the goal of ensuring the backup capability is available when needed. In reality, an RC, TOP and BA will have to operate utilizing backup functionality significantly more often than annually to ensure that backup functionality is available when needed. In fact, most RC, TOP, and BA already test their backup capability more often than annually even though the current requirement is for an annual test. They do this not because of the testing requirement but because of the need to continue to comply with other applicable requirements. If the other standards requirements already drive the entities to exceed this requirement, why is it needed? It is not. Requirement 9 should be struck. This requirement essentially represents an N-2 condition. The requirements should not try to anticipate extreme conditions such as this. Because RC, TOP and BA are still required to comply with the requirements even if they lose one of the operating centers or backup capability, the RC, TOP and BA will have to make plans to operate in the event of the</p>

	failure of their last operable control center. Thus, failure to begin developing a plan to replace the backup capability or primary control center will surely result in a violation of another requirement (actually likely many requirements).
	No
	With suggested changes.
	Group
	FirstEnergy Corp.
	Doug Hohlbaugh
	FirstEnergy Corp.
	No
	We understand and appreciate the drafting team's intent to eliminate the burden on a Transmission Operator with one radial connection under 200 kV to the BES by refining the applicability to exclude such entities. However, what if there was a single radial 200kV+ line to load not owned by the traditional TO/TOP in the area? Would the owner of the facility be required to have a primary/back-up control center? The applicability section of this standard is not the appropriate place to address these issues. The exclusion for TOPs operating only radial transmission lines serving load is contained in Section 501 sub-section 1.2.3 of the NERC Rules of Procedure. Exclusion issues should be vetted and managed in the Rules of Procedure and the registration processes. The applicability of this standard should point to the functional model entities used in the registration process. It may be simpler to state the applicability as follows related to the TOP: "Transmission Operator of Bulk Electric System (BES) facilities and/or any non-BES facilities, deemed materially important to the BES by the Regional Entity." We believe the SDT should avoid the word "critical" as it may cause confusion with the CIP references to Critical Assets.
	Yes
	We agree that the transition time frames should be equivalent for all applicable entities.
	Yes
	
	No
	Measures 1, 2, 3, 6, and 8 require a dated Operating Plan but there is nothing in the associated requirements that states the plan shall contain an effective date. The requirements section of the standard should cover all of the expectations Measures should not add to the requirements. We believe adding a subrequirement to R1 that requires the plan have an effective date, would provide the appropriate source documents to substantiate compliance for all requirements associated with the Operating Plan. Also, with the span of time that elapses between each compliance audit, the drafting team should consider whether the measures section should include statements to retain copies of revisions to the plan for the specified retention period as evidence of compliance. The measures could be simplified by not repeating text that has already been stated, so that the main point is clearly evident. For example in Measure M2 the intent of the requirement and measure is ensure a valid copy of the Operating Plan is located at both the primary and back-up centers. Therefore it may be more concise to say: "Each Reliability Coordinator, Balancing Authority, and applicable Transmission Operator shall have evidence of a valid Operating Plan, meeting R1/M1, is in force and located at its primary and back-up operating centers. It is suggested that the SDT consider this advice/recommendation throughout all measures to improve readability so that readers can quickly understand what is needed. There should be no need to re-peat text from other requirements/measures already covered within the standard.
	No
	The VSLs for Requirement 3 implies this method of operation is employed only when a TOP is directing operations through more than one other entity. We don't believe this to be the norm. The drafting team should consider the failure to include provisions for the loss of a percentage of such entity's or entities' total control functionality rather than basing the compliance measurement on the percentage of entities. For the requirement 4, the VSL's should be revised based on the needed revisions to the associated requirement. For the requirement 5, the VSL's should be revised based on the needed revisions to the associated requirement. For requirement 6, we believe a VSL could be written for each severity level using the time requirements established. For instance, high could apply to 18 months and severe to 21 months. For requirement 7, the VSL's should be revised based on the needed revisions to the associated requirement. For requirement 8, there is nothing in Requirement 8 as currently proposed by the drafting team that requires a two hour test. If there is an expectation for a test of the backup center to last two hours, it should be stated in the requirement. The VSL for Requirement 8 should be rewritten based on the needed revisions to the associated requirement. For requirement 9, the Regional Entity either already has the evidence or a violation has occurred because the report was not submitted on time. The responsible entity should not have to redemonstrate to the compliance auditor that it submitted the plan to the Regional Entity since the compliance auditor is the Regional Entity.
	Yes







	Yes
	Requirement R1.6.2 is not clear. The meaning of primary/backup is ambiguous. This requirement should be revised to state, "Actions to manage the risk to the BES during the transition from primary to backup functionality as well as during simultaneous outages of both the primary and backup functionality." Requirements R4 and R5 as written are very confusing. It appears the drafting team's expectation is for an entity to have either the primary or backup control center available and in use at all times. If that is the intent, the requirement should say that. Also, it appears the drafting team's expectation is compliance with all applicable Reliability Standards at all times. This is a requirement of the mandatory and enforceable reliability standards. R4 and R5 should be deleted. Requirement R6 as written is confusing. Who is intended to approve the Operating Plan for the backup functionality? Is it the intent of the drafting team for each entity to approve its own plan? Should these plans be required to be approved by a senior executive of the company? Should these plans be approved by the RC? Requirement R9 should be revised to state, "Each Reliability Coordinator, Balancing Authority, and applicable Transmission Operator that has experienced a loss of either its primary or backup capability due to a catastrophic event and anticipates the loss of either its primary or backup capability will last for more than six calendar months, shall provide a plan to its Regional Entity within six calendar months of the date when the functionality is lost, showing how it will re-establish backup capability." This requirement as currently proposed allows an entity 6 months to restore its backup functionality. Backup functionality should be restored as soon as repairs can be made in most cases. Only in a catastrophic event should an entity be allowed to be without backup for such a long period of time. Requirement 7 is unnecessary. If a RC, TOP and BA, can comply with all applicable requirements at all times from a backup control center that relies on facilities of their primary control center, then they have met the intent of the standards.
	Yes
	Yes - the standard is much improved in defining expectations of implementing back-up capability, testing of the back-up center etc. Although the time allowed to implement backup capability could be perceived to be an increase over the existing EOP-008-1 standard, the existing standard does not include a hard and fast rule on a 1 hour implementation. In EOP-008-1, an entity was permitted to have "interim provisions" without a hard-stop on the time needed to implement the back-up center. In the proposed EOP-008-2 standard, we believe the SDT made the appropriate steps to put a firm time limit for implementation and we feel the 2 hour limit is sufficient. The need to utilize one's backup capability is a rare event and the adjustment made should not adversely effect reliability of the BES.
	Individual
	H. Deon Murphy
	Bureau of Reclamation
	No
	In the applicability of the current draft, the term "Regional Entity" appears. This term is not a NERC defined term, nor is it added for this document, so to whom or what it refers is unclear. What entity(s) are expected to demonstrate the criticality? Is this Entity the RRO, a RC, or some other party? In addition the term "nonradial" is not clear, is it non-radial with respect to generation and/or load? The applicability should be for all Transmission Operators, with a provision to allow them to be granted a waiver from their RRO if that TOP can demonstrate why the standard should not apply to them.
	Yes
	Yes
	No
	These measures should be consistent with other existing data retention measures that have already been approved.
	Yes
	Yes
	Yes
	In requirement R1.1 the term "for a prolonged period of time" has been added. As this is a nebulous addition that does not add clarification to the requirement it should be deleted. Requirement R3 requires the TOP when "...directing BES operations through other entities..." to "include provisions for the loss of such other entity's control functionality in its Operating Plan for backup functionality." We agree with this requirement, however, there is no











	requirement for such provision to ever be coordinated with the other entity, or for the other entity to even be informed. We suggest adding to R3 or R6, language similar to: "Those provisions in the Operating Plans for backup functionality that deal with the loss of another entity's control functionality shall be coordinated with that entity when the Operating Plans are reviewed annually."
	No
	With regard to the decision not to include Generator Operator (GOP) centrally dispatched control centers we are concerned with the introduction of the degree of BES risk to the decision to make a standard applicable to a Reliability Function or to include it in a requirement. This is exemplified in the SDT's statement in their consideration: "The primary issue of whether centrally dispatched generation control centers should be applicable entities to the EOP-008-1 standard is an issue of risk exposure to the reliable operation of the BES." We believe that the usual emphasis is on risk avoidance, and such a change in the basis of what is included or covered by a standard or to whom it applies should be determined by using the NERC ANSI approved Standards process and not a single drafting team.
	Group
	ISO RTO Council Standards Review Committee
	Charles Yeung
	Southwest Power Pool
	No
	We agree with the drafting team's intent to eliminate the burden on a Transmission Operator that just has a radial connection to the BES under 200 kV by limiting TOP applicability. However, this is a registration issue and really identifies an issue with the definition of the BES. A standard is not the proper place to address registration and BES definition issues. The applicability should be just to the TOP and any limitation should be handled in registration. TOPs operating only radial transmission lines serving load are already excluded from registering per Section 501 sub-section 1.2.3 of the NERC Rules of Procedure. Limiting applicability further than this on radial transmission lines in essence redefines the BES and that is not a function of a standard. Please remove the language limiting the applicability.
	No
	We agree with and thank the drafting team for making the timeframes equivalent. However, we continue to believe that the new requirement is actually less stringent than the existing requirement. While the new requirement specifies that the backup plan must be implemented in two or less hours, the existing requirement specifies that interim provisions must be made if it will take more than one hour to implement the backup capability. Thus, even if the backup capability is not fully implemented within one hour, the responsible entity still has to have an alternative to operate without the primary control center within an hour. We also question what the 2 hours is based on. Have industry surveys or compliance audit results been utilized that demonstrate that two hours is required to fully implement the back up capability plan instead of the one? We recommend changing the implementation time back to one hour.
	No
	R7 should be a sub-requirement of R1. Thus, it should not have a VRF. The VRF for R8 should be lower. Given that the Operating Plan needs to be tested more frequently than annually to ensure that the backup capability is available when it is needed, this requirement is clearly intended to be administrative. Requirement 9 should be removed from the standard. This is, in essence, a requirement for an N-2 contingency. It is such a rare occurrence to operate from a backup center for an extended period of time that this requirement is not needed. If the RC, TOP or BA must operate from their backup center or utilizes their backup capability for an extended period of time, they should work with NERC and the Regional Entity to address the specific situation rather than having a requirement that dictates a time frame. We assess the reliability impact of (R9) failure to come up with a plan 6 months after an entity has experienced a loss of its primary control center or backup capability and expects such loss to last for 6 months or more is lower than any of the other requirements that are assigned a Medium VRF. We therefore suggest a Lower VSL be assigned to this requirement if the the requirement is retained.
	No
	Measures 1, 2, 3, 6, and 8 require dated, current, in force Operating Plan but there is no time requirement in the associated requirements. Measures should not add to the requirements. What does current really mean? How would the compliance auditor know if the Operating Plan is current given that the requirement does not mention date or time? We suggest removing the term in force because it does not add anything to the requirement. Why would the responsible entity supply an Operating Plan to the compliance auditor that wasn't in force? Measures 1, 2, 3, 6, and 8 also state that evidence of the last issue of the Operating Plan is required. There is nothing in the associated requirements about issuing. Thus again the measures are adding to the requirements but should not. To who is the Operating Plan required to be issued in the Measures? Part of the issue with Measure 6 is that its associated requirement really should be a sub-requirement of requirement 1. This would solve some of the issues with Measure 1. A large part of the issue with Measures 2, 3, 6, and 8 appear to be overuse of copy and paste. The only requirement associated with these measurements that really needs a dated Operating plan as evidence is

	<p>requirement 1 but as the requirement is currently written it does not require the Operating Plan to have a date. Measure 7 should not include a requirement for dated evidence. What is really needed is that the Operating Plan evidence presented should have a date and the Operating Plan should be verified to not depend on the primary control center. The compliance auditors could not practically verify that the backup capability or backup control center does not depend on the primary control center. Thus, the requirement associated with Measure 7 is really a sub-requirement of requirement 1. Measurement 9 should not require the RC, BA, and TOP to have evidence that a plan has been submitted to its Regional Entity when it loses its primary control center or backup capability or backup control center because the Regional Entity is the Compliance Enforcement Authority. The Regional Entity will know when the plan is received.</p>
	<p>No</p>
	<p>Guideline 3 of FERC's order conditionally approving VSLs for the original 83 regulatory approved standards stipulates that the VSL should not add to the requirement. The Lower VSL of R1 does add a requirement for the document to be dated which violates Guideline 3. Requirement 1 fits the multi-component category of the VSL Guidelines. This category puts the number of sub-requirements that are missing from the Operating Plan into quartiles. Thus, the Lower VSL would be missing one or two sub-requirements the Moderate VSL would be missing three or four sub-requirements the High VSL would be missing five to six sub-requirements and the Severe VSL would be missing seven sub-requirements or the plan would not exist. The VSLs for Requirement 2 should use the term back-up capability along with primary control center for consistency with the requirements. R2 requires a copy of the plan be provided at both the primary and backup facilities. Failing to provide any copy at all is a complete violation of the requirement and hence should be assigned a Severe VSL, not Medium (note that VSL is a measure of the extent to which a requirement is not met, not its impact). We therefore suggest to move the two conditions from Low/Medium to High/Severe in accordance with established VSL guideline. The VSLs for Requirement 3 really don't make any sense. It implies there may be more than one other entity that a TOP is directing BES operations through. We don't think that this is likely. Additionally, the VSLs as written do not seem to fit any category within the VSL guidelines document. Why would the VSLs not be divided into quartiles based the number of entities? For the requirement 4, the Lower VSL violates FERC's guideline 3 established in their order conditionally approving VSLs since the VSL indicates a date which is not in the requirement. Additionally, the VSLs do not consider most of the range of possibilities foreseen by the drafting team. For example, compliance with 83% of the reliability standards does not fit any VSL. Review of these VSLs cause us to question if the associated requirement needs to be modified. If the requirement is that the BA or TOP has a backup capability plan, isn't the BA or TOP still required to comply with all other reliability standards? Thus, why does the requirement need to explicitly state this. Doesn't this present an opportunity for double jeopardy? The Severe level should include a condition that the RC provides less than 70% of the functionality required for maintaining compliance with the Reliability Standards applicable to an RC. Otherwise, there will not be any VSL for RC providing functionality sufficient for maintaining compliance with, say, 40% of the Reliability Standards. Further, the proposed wording change, i.e., &lt;70%, covers the condition of not having any functionality at all to comply with reliability standards.</p> <p>For the requirement 5, the Lower VSL violates FERC's guideline 3 established in their order conditionally approving VSLs since the VSL indicates a date which is not in the requirement. Additionally, the VSLs do not consider most of the range of possibilities foreseen by the drafting team. For example, compliance with 83% of the reliability standards does not fit any VSL. Review of these VSLs cause us to question if the associated requirement needs to be modified. If the requirement is that the RC has a backup control center, isn't the RC still required to comply with all other reliability standards? Thus, why does the requirement need to explicitly state this. Doesn't this present an opportunity for double jeopardy? Perhaps the drafting team should consider applying VSLs based on if monitoring, control, logging and alarming are included in the backup capability. The Severe level should include a condition that the BA or TOP provides less than 70% of the functionality required for maintaining compliance with the Reliability Standards applicable to an RC. Otherwise, there will not be any VSL for RC providing functionality sufficient for maintaining compliance with, say, 40% of the Reliability Standards. Further, the proposed wording change, i.e., &lt;70%, covers the condition of not having any functionality at all to comply with reliability standards. In its order approving VSLs, the FERC stated in paragraph 27 that they prefer gradated VSLs whenever possible. For requirement 6, we believe a VSL could be written for each severity level using the time requirements established. For instance, high could apply to 18 months and severe to 21 months. Additionally, the VSLs for requirement 6 violate FERC's guideline 3 by requiring the Operating Plan to be dated. The associated requirement does not mention dating. There are no VSLs assigned to High and Severe. We suggest the SDT to provide the conditions that an entity fails to meet the bulk of the intent of this requirement (High) and fails to meet this requirement completely (Severe). For example, a High VSL can be assigned if the entity did not update its plan after 18 months or 120 calendar days after changes were made to the backup capability; a Severe for failing to update its plan for a longer time period or at all. For requirement 7, the only VSL does not make any sense. The VSL implies that the responsible entity may provide evidence that backup plan depends on the primary control center. Why would the responsible entity providing evidence of non-compliance be a severity level? The purpose of providing evidence is to demonstrate compliance. Is this requirement 7 even needed? There are requirements in this standard that require a backup plan. The responsible entity is responsible to comply with this standard and with all other standards even when operating with the backup plan. Can they comply with other standards if the backup plan depends on the primary control center and the primary control center is destroyed? No. Thus, they would violate many other standards. Thus, requirement 7 is implied and not needed explicitly as a requirement. For requirement</p>


	<p>8, we do not support a mandatory testing time of two hours or a transition time of two hours. However, considering the requirement as written, we suggest the drafting team could develop VSLs for all levels. VSLs could be written as: Lower: Tested the back plan for 90 minutes or more but less than two hours or The transition time was more than two hours but less than or equal to 3 hours. Moderate: Tested the back plan for one hour or more but less than 90 minutesThe transition time was more than three hours but less than or equal to four hours. High: Tested the backup plan for 30 minutes or more but less than one hour or The transition time was more than four hours but less than or equal to five hours. Severe: Tested the back up plan for less than 30 minutes or The transition time was more than five hours or or the test results and lessons learned were not incorporated in subsequent revisions.. For requirement 9, the VSL perpetuates some of the problems that are currently occurring with compliance monitoring of requirements that have periodic reporting requirements to the Regional Entity. The Regional Entity either already has the evidence or a violation has occurred because the report was not submitted on time. The responsible entity should not have to redemonstrate to the compliance auditor that it submitted the plan to the Regional Entity since the compliance auditor is the Regional Entity.</p>
	Yes
	
	Yes
	<p>We do not agree with the transition requirement of two hours. We believe that the transition time as worded in the existing standard actually requires full implementation of the backup plan in one hour or to provide an alternative to continue operations. Thus, we assume the drafting team must have had a compelling reason for changing to two hours. What is the reason? Is there data justifying it? We recommend changing it back to one hour. Requirement 2 is not needed. What is important is that the plan gets implemented when needed not that some compliance auditor can verify there is a copy of the plan at the backup and primary control centers. Most entities are going to have their plans at the primary and backup control centers to allow them to implement the plan. If they don't, they likely won't be able to implement their plan in the required time frame. Thus, they will already be violating another requirement so lets not provide an opportunity for double jeopardy. Requirement 3 stipulates that "Each applicable Transmission Operator directing BES operations through other entities shall include provisions for the loss of such entity's control functionality in its Operating Plan for backup functionality." We do not agree that this requirement should apply to the TOP only. There might well be situations that an RC or a BA directs it operations through other entities as well. We suggest the requirement should also include the RC and the BA by rewording the requirement to: "Each Reliability Coordinator, Balancing Authority and applicable Transmission Operator directing BES operations..." Wording of requirement 3 is ambiguous in that in some areas/jurisdictions, there are multiple TOPs that one of them directs the operations of the others. For example, an ISO is registered as a TOP while a transmission entity (an owner, for example) within the ISO footprint is also registered as a TOP. The two TOPs perform distinctly different tasks and may even have their tasks and responsibilities clearly stipulated in an agreement, market rule or regional reliability plan. The ISO-TOP directs operations of the transmission-entity-TOP while the latter may be solely responsible for switching operations and maintenance. Both need to have backup capability. The way R3 is worded can be interpreted that the ISO-TOP needs to be responsible for the backup capability of the transmission-entity-TOP. We do not believe this is the intent of R3, and this is not practical. To clarify this situation, we suggest R3 to be reworded to: "Each applicable Transmission Operator delegating its tasks for BES operations to other entities shall include provisions for the loss of such entity's control functionality in its Operating Plan for backup functionality." In other words, this requirement only applies to a TOP if it delegates it task (for which it is still fully responsible) to another entity. For Requirement 4, we are not sure why the condition: "...during the time period when the primary control center functionality and the backup functionality are both available for use..." is included since having both control center functionality available for use suffice to meet the condition for: "...have a backup control center facility (provided through its own dedicated backup facility or at another entity's control center) that provides the functionality required for maintaining compliance with all Reliability Standards applicable to the Reliability Coordinator." If the intent of this requirement is to ensure the functionality works, then the requirements should simply stipulate such a demonstration. In fact, the intent of R8 is to ensure that the backup capability is functional when called upon. We therefore hold the view that R4 (and R5) is not needed. We further do not understand the clause "that provides functionality required for maintaining compliance with all Reliability Standards applicable to the Reliability Coordinator". The RC is already required to comply with these standards regardless of whether they operate from the backup center or the primary center. Requirements should never require compliance with other requirements because it creates the opportunity for double jeopardy. For Requirement 5, please see our comments on regarding Requirement 4.. We do not think Requirement 5 is needed. If retained, the wording should be changed to require a demonstration of the backup capability's functionality. Furthermore, we don't understand the need for the statement "sufficient for maintaining compliance with all Reliability Standards applicable to a Balancing Authority or Transmission Operator respectively" in the requirement. The BA and TOP are already required to comply with these standards regardless of whether they operate from the location of their backup capability or the primary center. Requirement 6 is really a sub-requirement of requirement 1. Sub-requirement 6.1 is confusing. Because it is a sub-requirement, it must apply to requirement 6. Thus, it would seem that the sub-requirement is requiring the annual review and approval to occur within 60 days of any changes. What if there are multiple changes in the year? From this perspective, it appears that the sub-requirement is intended to reflect that changes can occur at any time. To clarify the requirement. we</p>


	<p>suggest the following language as a sub-requirement of R1 along with striking requirement 6 and 6.1: "Each RC, BA an TOP shall review and approve its Operating Plan for backup functionality annually and within sixty calendar days of any changes to the backup location, capabilities or contact information, modify the Operating Plan to reflect the changes." Requirement 7 is unnecessary as an explicit requirement. Each RC, TOP and BA is required to comply with all applicable requirements even if they are operating from the location of their backup functionality or backup control center. If their backup functionality relies on the primary control center, the RC, TOP and BA will be unable to comply with numerous other requirements in the event that they lose the functionality of their primary control center. Requirement 8 is not needed and does not accomplish the goal of ensuring the backup capability is available when needed. In reality, an RC, TOP and BA will have to confirm that availability of their backup functionality significantly more often than annually to ensure that backup functionality is available when needed. In fact, most RC, TOP, and BA already confirm the availability of their backup capability more often than annually even though the current requirement is for an annual test. They do this not because of the testing requirement but because of the need to continue to comply with other applicable requirements. If the other standards requirements already drive the entities to exceed this requirement, why is it needed? It is not. Requirement 9 should be struck. This requirement essentially represents an N-2 condition. The requirements should not try to anticipate extreme conditions such as this. Because RC, TOP and BA are still required to comply with the requirements even if they lose one of the operating centers or backup capability, the RC, TOP and BA will have to make plans to operate in the event of the failure of their last operable control center. Thus, failure to begin developing a plan to replace the backup capability or primary control center will surely result in a violation of another requirement (actually likely many requirements).</p>
	No
	We believe that the standard may actually reduce reliability slightly given that the timing requirement for operating utilizing your backup capability has been increased. Given that the need to utilize your backup capability is a rare event, even this reduced level of reliability may be acceptable.
	Individual
	Rick White
	Northeast Utilities
	No
	The addition of the language, "operating Facilities at 200 kV or above, or nonradial Facilities above 100 kV", is not appropriate.
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	<p>The revised language in R4 and R5 does not clarify the intent, which we believe is to prevent a violation for not having a backup facility during the time period when it has become necessary to utilize the backup facility. i.e. - that a backup for the backup is not required. We believe this clarification is not needed as separate requirements and results in confusing text. One possible solution would be to eliminate R4 &amp; R5 and include the clarifying thoughts in the Measures. R7 includes the necessary language from R4 &amp; R5, and could be included as one of the sub-requirements in R1, or combined with R1.3.</p>
	Yes
	Group
	Midwest ISO Standards Collaborators
	Jason Marshall
	Midwest ISO
	No


	<p>We agree with the drafting team's intent to eliminate the burden on a Transmission Operator that just has a radial connection to the BES under 200 kV by limiting TOP applicability. However, this is a registration issue and really identifies an issue with the definition definition of the BES. A standard is not the proper place to address registration and BES definition issues. The applicability should be just to the TOP and any limitation should be handled in registration. TOPs operating only radial transmission lines serving load are already excluded from registering per Section 501 sub-section 1.2.3 of the NERC Rules of Procedure. Limiting applicability further than this on radial transmission lines in essence redefines the BES and that is not a function of a standard. Please remove the language limiting the applicability. We urge the drafting team to communicate the need to limit applicability of certain requirements in the registration process. This is a broader problem that NERC needs to resolve.</p>
	<p>Yes</p>
	
	<p>No</p>
	<p>R7 should be a sub-requirement of R1. Thus, it should not have a VRF. The VRF for R8 should be lower. Given that the Operating Plan needs to be tested more frequently than annually to ensure that the backup capability is available when it is needed, this requirement is clearly intended to be administrative. Requirement 9 should be removed from the standard. This is, in essence, is a requirement for an N-2 contingency. It is such a rare occurrence to operate from a backup center for an extended period of time that this requirement is not needed. If the RC, TOP or BA must operate from their backup center or utilizing their backup capability for an extended period of time, they should work with NERC and the Regional Entity to address the specific situation rather than having a requirement that dictates a time frame.</p>
	<p>No</p>
	<p>Measures 1, 2, 3, 6, and 8 require dated, current, in force Operating Plan but there is no time requirement in the associated requirements. Measures should not add to the requirements. What does current really mean? How would the compliance auditor know if the Operating Plan is current given that the requirement does not mention date or time? We suggest removing the term in force because it does not add anything to the requirement. Why would the responsible entity supply an Operating Plan to the compliance auditor that wasn't in force? Measures 1, 2, 3, 6, and 8 also state that evidence of the last issue of the Operating Plan is required. There is nothing in the associated requirements about issuing. Thus again the measures are adding to the requirements but should not. To who is the Operating Plan required to be issued in the Measures? Part of the issue with Measure 6 is that its associated requirement really should be a sub-requirement of requirement 1. This would solve some of the issues with Measure 1. A large part of the issue with Measures 2, 3, 6, and 8 appear to be overuse of copy and paste. The only requirement associated with these measurements that really needs a dated Operating plan as evidence is requirement 1 but as the requirement is currently written it does not require the Operating Plan to have a date. Measure 7 should not include a requirement for dated evidence. What is really needed is that the Operating Plan evidence presented should have a date and the Operating Plan should be verified to not depend on the primary control center. The compliance auditors could not practically verify that the backup capability or backup control center does not depend on the primary control center. Thus, the requirement associated with Measure 7 is really a sub-requirement of requirement 1. Measurement 9 should not require the RC, BA, and TOP to have evidence that a plan has been submitted to its Regional Entity when it loses its primary control center or backup capability or backup control center because the Regional Entity is the Compliance Enforcement Authority. The Regional Entity will know when the plan is received.</p>
	<p>No</p>
	<p>Guideline 3 of FERC's order conditionally approving VSLs for the original 83 regulatory approved standards stipulates that the VSL should not add to the requirement. The Lower VSL of R1 does add a requirement for the document to be dated which violates Guideline 3. Requirement 1 fits the multi-component category of the VSL Guidelines. This category puts the number of sub-requirements that are missing from the Operating Plan into quartiles. Thus, the Lower VSL would be missing one or two sub-requirements the Moderate VSL would be missing three or four sub-requirements the High VSL would be missing five to six sub-requirements and the Severe VSL would be missing seven sub-requirements or the plan would not exist. The VSLs for Requirement 2 should use the term back-up capability along with primary control center for consistency with the requirements. We agree with these levels. The VSLs for Requirement 3 really don't make any sense. It implies there may be more than one other entity that a TOP is directing BES operations through. We don't think that this is likely. Additionally, the VSLs as written do not seem to fit any category within the VSL guidelines document. Why would the VSLs not be divided into quartiles? For the requirement 4, the Lower VSL violates FERC's guideline 3 established in their order conditionally approving VSLs since the VSL indicates a date which is not in the requirement. Additionally, the VSLs do not consider most of the range of possibilities foreseen by the drafting team. For example, compliance with 83% of the reliability standards does not fit any VSL. Review of these VSLs cause us to question if the associated requirement needs to be modified. If the requirement is that the BA or TOP has a backup capability plan, isn't the BA or TOP still required to comply with all other reliability standards? Thus, why does the requirement need to explicitly state this. Doesn't this present an opportunity for double jeopardy? For the requirement 5, the Lower VSL violates FERC's guideline 3 established in their order conditionally approving VSLs since the VSL indicates a date</p>




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

 Yes



 No

Requirement 2 is not needed. What is important is that the plan gets implemented when needed not that some compliance auditor can verify there is a copy of the plan at the backup and primary control centers. Most entities are going to have their plans at the primary and backup control centers to allow them to implement the plan. If they don't, they likely won't be able to implement their plan in the required time frame. Thus, they will already be violating another requirement so lets not provide an opportunity for double jeopardy. Requirement 4 should strike "that provides functionality required for maintaining compliance with all Reliability Standards applicable to the Reliability Coordinator". The RC is already required to comply with these standards regardless of whether they operate from the backup center or the primary center. Requirement 5 should strike "sufficient for maintaining compliance with all Reliability Standards applicable to a Balancing Authority or Transmission Operatore respectively". The BA and TOP are already required to comply with these standards regardless of whether they operate from the location of their backup capability or the primary center. Further, we urge the drafting team to consider combining requirements 4 and 5 to require full backup control centers for the TOP and BA as well as the RC. Requirement 5 is already stringent enough that a backup control center is likely required anyway. Combining the requirements just simplifies the standards. Requirement 6 is really a sub-requirement of requirement 1. Sub-requirement 6.1 is confusing. Because it is a sub-requirement, it must apply to requirement 6. Thus, it would seem that the sub-requirement is requiring the annual review and approval to occur withing 60 days of any changes. What if there are multiple changes in the year? From this perspective, it appears that the sub-requirement is intended to reflect that changes can occur at any time. To clarify the requirement, we suggest the following language as a sub-requirement of R1 along with striking requirement 6 and 6.1: "Each RC, BA an TOP shall review and approve its Operating Plan for backup functionality annually and within sixty calendar days of any changes to the backup location, capabilities or contact information, modify the Operating Plan to reflect the changes." Requirement 7 is unnecessary as an explicit requirement. Each RC, TOP and BA is required to comply with all applicable requirements even if they are operating from the location of their backup functionality or backup control center. If their backup functionality relies on the primary control center, the RC, TOP and BA will be unable to comply with numerous other requirements in the event that they lose the functionality of their primary control center. Requirement 8 is not needed and does not accomplish the goal of ensuring the backup capability is available when needed. In reality, an RC, TOP and BA will have to operate utilizing backup functionality significantly more often than annually to ensure that backup functionality is available when needed. In fact, most RC, TOP, and BA already test their backup capability more often than annually even though the current

	<p>requirement is for an annual test. They do this not because of the testing requirement but because of the need to continue to comply with other applicable requirements. If the other standards requirements already drive the entities to exceed this requirement, why is it needed? It is not. Requirement 9 should be struck. This requirement essentially represents an N-2 condition. The requirements should not try to anticipate extreme conditions such as this. Because RC, TOP and BA are still required to comply with the requirements even if they lose one of the operating centers or backup capability, the RC, TOP and BA will have to make plans to operate in the event of the failure of their last operable control center. Thus, failure to begin developing a plan to replace the backup capability or primary control center will surely result in a violation of another requirement (actually likely many requirements).</p>
	Yes
