

Consideration of Comments on Initial Ballot — Back-up Facilities Standard Drafting Team (Project 2006-04)

Summary Consideration: The comments received were basically re-statements of comments that were issued during the project posting periods and centered on items such as the transition timeframe, independent operation, need for tertiary facilities, etc. Commenters were requesting clarity on these issues prior to adopting the standard. Given the rather large number of clarifying requests, the Standards Committee terminated the voting process and remanded the standard back to the SDT for an additional posting. In response to the Standards Committee's directive and industry comments, the SDT has revised several of the requirements as shown below. Corresponding changes were made to Measures, data retention, and VSLs to bring the wording in those sections up to date with the changes to the requirements.

R1, part 1.1: The location and method of implementation for providing backup functionality for the time it takes to restore the primary control center functionality.

R1, part 1.2.1: Tools and applications to ensure that operating personnel have situational awareness of the BES.

R3. Each Reliability Coordinator shall have a backup control center facility (provided through its own dedicated backup facility or at another entity's control center staffed with certified Reliability Coordinator operators when control has been transferred to the backup facility) that provides the functionality required for maintaining compliance with all Reliability Standards that depend on primary control center functionality. To avoid requiring a tertiary facility, a backup facility is not required during:

R4. Each Balancing Authority and Transmission Operator shall have backup functionality (provided either through a facility or contracted services staffed by applicable certified operators when control has been transferred to the backup functionality location) that includes monitoring, control, logging, and alarming sufficient for maintaining compliance with all Reliability Standards that depend on a Balancing Authority and Transmission Operator's primary control center functionality respectively. To avoid requiring tertiary functionality, backup functionality is not required during:

R6. Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have primary and backup capabilities that do not depend on each other for the functionality required to maintain compliance with Reliability Standards.

In addition, the SDT updated the VSLs to comply with the latest guidelines on the drafting of VSLs. As VSLs were not part of the industry request for changes they are not shown in this document but are shown in the revised standard.

The SDT is requesting to post the standard for an additional 30-day comment period.

If you feel that the drafting team overlooked your comments, please let us know immediately. Our goal is to give every comment serious consideration in this process. If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Gerry Adamski, at 609-452-8060 or at gerry.adamski@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

¹ The appeals process is in the Reliability Standards Development Procedure: http://www.nerc.com/files/RSDP_V6_1_12Mar07.pdf.

Voter	Entity	Segment	Vote	Comment
Carolyn Ingersoll	Constellation Energy	3	Negative	<p>1. R1 states that the Operating Plan is to address loss of primary control center functionality. However R4 states that Balancing Authorities and Transmission Operators must have backup functionality... "that depend on Balancing Authority and Transmission Operators primary control center functionality respectively." I believe that language is intending to communicate that the back up functionality must be able to perform the same, or similar, functions that are available in the primary control center this is not clear.</p> <p>2. R4 states that "each Balancing Authority and Transmission Operator shall have backup functionality (provided either through a facility or contracted services staffed by applicable certified operators). The standard should not mandate how an entity ensures that backup functionality exists.</p>
<p>Response: 1. The intent is that the backup functionality must support the reliable operation of the BES and comply with the applicable Reliability Standards. However, the standard addresses only those functions required to support reliability of the BES. Peripheral functionality such as accounting may reside in a primary control center but they are not the concern of this standard. Only those functions that support reliability must be 'backed up'. The quoted phrase is out of context and must be read with the preamble "...sufficient for maintaining compliance with all Reliability Standards..." to provide the proper context. No change made.</p> <p>2. The standard allows for the flexibility to provide an owned facility or to get the service through contract as stated in FERC Order 693. It provides options so it is not prescriptive and doesn't mandate a particular 'how'. No change made.</p>				
William L. Thompson	Dominion Virginia Power	1	Negative	<p>As written, the clarifications do not appear to have avoided the need for tertiary facilities/functionalities. In fact, the proposed wording implies that there is a need for tertiary facilities/functionalities if a planned outage of more than two weeks is anticipated. An RC or TOP is not likely to assume that some day they might have to plan an outage in excess of two weeks and then go ahead and acquire tertiary facilities/functionalities to have on hand just in case. Therefore, it should be clear that, under normal operations (all systems "Go"), only primary and adequate backup facilities/functionalities are required for compliance. Failure to provide adequate backup in the first place would constitute non-compliance. Under degraded operations (loss of primary facilities/functionalities or loss of the adequate backup facilities/functionalities previously provided), there should be separate and specific requirements for plans an RC or TOP should make and/or actions they should take until normal operations are restored (similar to what R1.6.2 now says but promoted to a stand-alone requirement). Compliance under degraded operations would be evaluated based on these new requirements specific to degraded operations instead of the original requirements to have backup facilities/functionalities. This eliminates the conundrum of being non-compliant when primary or backup facilities/functionalities are lost.</p>

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Mike Garton	Dominion Resources, Inc.	5	Negative	<p>As written, the clarifications do not appear to have avoided the need for tertiary facilities/functionalities. In fact, the proposed wording implies that there is a need for tertiary facilities/functionalities if a planned outage of more than two weeks is anticipated. An RC or TOP is not likely to assume that some day they might have to plan an outage in excess of two weeks and then go ahead and acquire tertiary facilities/functionalities to have on hand just in case. Therefore, it should be clear that, under normal operations (all systems "Go"), only primary and adequate backup facilities/functionalities are required for compliance. Failure to provide adequate backup in the first place would constitute non-compliance. Under degraded operations (loss of primary facilities/functionalities or loss of the adequate backup facilities/functionalities previously provided), there should be separate and specific requirements for plans an RC or TOP should make and/or actions they should take until normal operations are restored (similar to what R1.6.2 now says but promoted to a stand-alone requirement). Compliance under degraded operations would be evaluated based on these new requirements specific to degraded operations instead of the original requirements to have backup facilities/functionalities. This eliminates the conundrum of being non-compliant when primary or backup facilities/functionalities are lost.</p>
Louis S Slade	Dominion Resources, Inc.	6	Negative	<p>As written, the clarifications do not appear to have avoided the need for tertiary facilities/functionalities. In fact, the proposed wording implies that there is a need for tertiary facilities/functionalities if a planned outage of more than two weeks is anticipated. An RC or TOP is not likely to assume that some day they might have to plan an outage in excess of two weeks and then go ahead and acquire tertiary facilities/functionalities to have on hand just in case. Therefore, it should be clear that, under normal operations (all systems "Go"), only primary and adequate backup facilities/functionalities are required for compliance. Failure to provide adequate backup in the first place would constitute non-compliance. Under degraded operations (loss of primary facilities/functionalities or loss of the adequate backup facilities/functionalities previously provided), there should be separate and specific requirements for plans an RC or TOP should make and/or actions they should take until normal operations are restored (similar to what R1.6.2 now says but promoted to a stand-alone requirement). Compliance under degraded operations would be evaluated based on these new requirements specific to degraded operations instead of the original requirements to have backup facilities/functionalities. This eliminates the conundrum of being non-compliant when primary or backup facilities/functionalities are lost.</p>

Response: The SDT does not intend for entities to have tertiary facilities or functionality. If a planned outage were to take more than the 2 weeks indicated, then the SDT would expect that the affected entity would work with their Region to come up with an acceptable plan to cover the risk involved.

Voter	Entity	Segment	Vote	Comment
Edward F. Groce	Avista Corp.	5	Negative	We suggest changing the wording in R4 from "Planned outages of the primary or backup facilities of two weeks or less" to "Planned outages of the primary or backup facilities of ten weeks or less". We believe that two weeks is too short a time for the type of remodels that might be required of control center facilities or systems, and the resources and time required to implement a tertiary facility can be substantial compared to the risk. Another approach is to treat planned outages similar to the way unplanned outages are in requirement 8. That is to require a plan to be developed and submitted for longer term planned outages to the Regional Entity.
Scott Kinney	Avista Corp.	1	Negative	We suggest changing the wording in requirement 4 from "Planned outages of the primary or backup facilities of two weeks or less" to "Planned outages of the primary or backup facilities of ten weeks or less". We believe that two weeks is too short a time for the type of remodels that might be required of control center facilities or systems, and the resources and time required to implement a tertiary facility can be substantial compared to the risk. Another approach is to treat planned outages similar to the way unplanned outages are in requirement 8. That is to require a plan to be developed and submitted for longer term planned outages of the primary or backup facility to the Regional Entity.
Donald S. Watkins	Bonneville Power Administration	1	Negative	Regarding R4, BPA suggests changing the wording from "Planned outages of the primary or backup facilities of two weeks or less" to "Planned outages of the primary or backup facilities of four weeks or less." We believe that 2 weeks may be too short a time for the type of remodels that might be required of control center facilities or systems and suspect there is very little risk with extending the allowed time period to 4 weeks before requiring a tertiary facility.
Rebecca Berdahl	Bonneville Power Administration	3	Negative	Regarding R4, BPA suggests changing the wording from "Planned outages of the primary or backup facilities of two weeks or less" to "Planned outages of the primary or backup facilities of four weeks or less." We believe that 2 weeks may be too short a time for the type of remodels that might be required of control center facilities or systems and suspect there is very little risk with extending the allowed time period to 4 weeks before requiring a tertiary facility.
Brenda S. Anderson	Bonneville Power Administration	6	Affirmative	BPA suggests changing the wording on R4 from: Planned outages of the primary or backup facilities of two weeks or less to Planned outages of the primary or backup facilities of four weeks or less. BPA suggests that a tertiary facility not be required for planned outages of the primary or backup control center facility of up to four weeks. Remodeling of a facility may take longer than two weeks. That would result in requiring the expense of finding a tertiary facility that's not needed for a 3 to 4 week construction period.

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Francis J. Halpin	Bonneville Power Administration	5	Affirmative	regarding R4: BPA suggests changing the wording from: Planned outages of the primary or backup facilities of two weeks or less to: Planned outages of the primary or backup facilities of four weeks or less BPA also suggests that a tertiary facility not be required for planned outages of the primary or backup control center facility of up to four weeks. Remodeling of a facility may take longer than two weeks. That would result in requiring the expense of finding a tertiary facility that's not needed for a 3 to 4 week construction period.
John D. Martinsen	Public Utility District No. 1 of Snohomish County	4	Negative	The District suggest changing the wording in R4 from "Planned outages of the primary or backup facilities of two weeks or less" to "Planned outages of the primary or backup facilities of four weeks or less." Two weeks may be too short a time for the type of remodels that might be required of control center facilities or systems. Extending the allowed time period to four weeks before requiring a tertiary facility would be a reasonable requirement.
Daniel Mark Bedbury	Eugene Water & Electric Board	6	Negative	The only change would be to alter the wording in R4 from "Planned outages of the primary or backup facilities of two weeks or less" to "Planned outages of the primary or backup facilities of four weeks or less." We believe that two weeks may be too short a time for the type of remodels that might be required of control center facilities or systems and suspect there is very little risk with extending the allowed time period to four weeks before requiring a tertiary facility.
Richard Salgo	Sierra Pacific Power Co.	1	Affirmative	Affirmative vote, but would still suggest a minor language change in R4 to increase the duration of planned outages of backup or primary control centers from 2 weeks to 30 days (or 4 weeks). This would better accommodate construction and re-model projects in the control center without posing any significant risk.

Response: The SDT intended that a backup facility/functionality is required to support the loss of the primary facility. The SDT debated the length of time to use for this requirement and has vetted it through the industry comment periods to date. The majority of respondents are comfortable with the two week figure. No change made.

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Jeff Knottek	City Utilities of Springfield, Missouri	1	Negative	City Utilities of Springfield, Missouri casts a negative vote with the following request for the drafting team. Remove R1.2. from the standard. Since R1.3. requires "An Operating Process for keeping the backup functionality consistent with the primary control center" and all items listed in R1.2. except R1.2.4. are already required for the primary control center in other NERC Standards, to list them again is redundant and unnecessary. 1.2.1. Tools and applications that allow visualization capabilities that ensure that operating personnel have situational awareness of the BES. (TOP-006 R2., R5., R7 and IRO-002 R5. - R8.) 1.2.2. Data communications. (TOP-005 and IRO-002 R1. - R3.) 1.2.3. Voice communications. (COM-001 R1. and IRO-002 R1.) 1.2.4. Power source(s). (Power source(s)) is an obvious need to maintain functionality consistent with the primary control center and doesn't need to be a requirement in the standard.) 1.2.5. Physical and cyber security. (CIP-002 through CIP-009)
Bruce Merrill	Lincoln Electric System	3	Negative	LES is concerned with the inclusion of "Physical and cyber Security" in R1.2.5. This requirement could be incorrectly interpreted to mean that all backup facilities are Critical Assets and must meet the CIP-003 to CIP-009 requirements. In CIP-002 a company is required to create a risk based methodology and determine which of their assets are Critical Assets. CIP-002-1 R1.2.1 requires that the risk based methodology include backup control centers. LES believes that EOP-008-1 R1.2.5 is at best confusing and at worst duplicative, and should therefore be removed. Additionally, the Requirements 1.2.1 - 1.2.5 are a 'list of elements required to support the backup functionality' per R1.2. The first 4 elements (tools, data communication, voice communication, and power sources) are indeed needed to support backup functionality, however the 5th element "Physical and cyber security" is not needed to support backup functionality. This serves to further our case that R1.2.5 should be removed from this standard.
Dennis Florom	Lincoln Electric System	5	Negative	LES is concerned with the inclusion of "Physical and cyber Security" in R1.2.5. This requirement could be incorrectly interpreted to mean that all backup facilities are Critical Assets and must meet the CIP-003 to CIP-009 requirements. In CIP-002 a company is required to create a risk based methodology and determine which of their assets are Critical Assets. CIP-002-1 R1.2.1 requires that the risk based methodology include backup control centers. LES believes that EOP-008-1 R1.2.5 is at best confusing and at worst duplicative, and should therefore be removed. Additionally, the Requirements 1.2.1 - 1.2.5 are a 'list of elements required to support the backup functionality' per R1.2. The first 4 elements (tools, data communication, voice communication, and power sources) are indeed needed to support backup functionality, however the 5th element "Physical and cyber security" is not needed to support backup functionality. This serves to further our case that R1.2.5 should be removed from this standard.

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Eric Ruskamp	Lincoln Electric System	6	Negative	LES is concerned with the inclusion of "Physical and cyber Security" in R1.2.5. This requirement could be incorrectly interpreted to mean that all backup facilities are Critical Assets and must meet the CIP-003 to CIP-009 requirements. In CIP-002 a company is required to create a risk based methodology and determine which of their assets are Critical Assets. CIP-002-1 R1.2.1 requires that the risk based methodology include backup control centers. LES believes that EOP-008-1 R1.2.5 is at best confusing and at worst duplicative, and should therefore be removed. Additionally, the Requirements 1.2.1 - 1.2.5 are a ' list of elements required to support the backup functionality' per R1.2. The first 4 elements (tools, data communication, voice communication, and power sources) are indeed needed to support backup functionality, however the 5th element "Physical and cyber security" is not needed to support backup functionality. This serves to further our case that R1.2.5 should be removed from this standard.

Response: The items listed in Requirement R1, part 1.2 are simply a list of items that must be addressed in the plan and are not performance requirements so no duplication occurs. The other standards cited would still dictate the performance requirements for those elements. **No change made.**

Douglas E. Hils	Duke Energy Carolina	1	Negative	Duke Energy appreciates the work of the drafting team on this subject; regretfully we must vote against this ballot knowing that another SAR must be submitted if the ballot fails. It is our opinion that Requirements R3 and R4 should be modified to clarify that a backup facility does not have to be continuously staffed by applicable certified operators, and that applicable functional entities are allowed a two-hour transition period to fully implement the backup functionality, as specified in R1.5. Requirement R6 should be clarified to indicate the degree of independence that must be maintained between the primary and backup capabilities. Thank you.
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Response: It is the intent of Requirements R3 & R4 that when the backup facility is activated it then be staffed by certified operators. The SDT has clarified this intent in revised Requirements R3 & R4 (with corresponding changes to Measures, data retention, and the VSLs). The SDT confirms that entities are provided a two-hour transition period to fully implement the backup functionality.

R3. Each Reliability Coordinator shall have a backup control center facility (provided through its own dedicated backup facility or at another entity's control center staffed with certified Reliability Coordinator operators when control has been transferred to the backup facility) that provides the functionality required for maintaining compliance with all Reliability Standards that depend on primary control center functionality. To avoid requiring a tertiary facility, a backup facility is not required during:

R4. Each Balancing Authority and Transmission Operator shall have backup functionality (provided either through a facility or contracted services staffed by applicable certified operators when control has been transferred to the backup functionality location) that includes monitoring, control, logging, and alarming sufficient for maintaining compliance with all Reliability Standards that depend on a Balancing Authority and Transmission Operator's primary control center functionality respectively. To avoid requiring tertiary functionality, backup functionality is not required during:

R6: The intent of the requirement is that you can't depend on your primary facility for adequate functionality at your backup facility/functionality (or vice versa) for compliance to the Reliability Standards. This means that nothing at your backup facility/functionality can depend on anything at your primary facility for any

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<p>item that would be required for you to maintain compliance with all applicable Reliability Standards at your backup facility/functionality (or vice versa). The requirement is not intended to encompass equipment typically located outside of the control center such as RTUs. Requirement R6 has been revised to provide additional clarity on this point (with corresponding changes to Measure M6, data retention, and the VSLs).</p> <p>R6. Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have primary and backup capabilities that do not depend on each other for the functionality required to maintain compliance with Reliability Standards.</p>				
Larry Monday	E.ON U.S. LLC	1	Negative	<p>E.ON U.S. requests that the SDT clarify what is meant in Requirement 1.2.1 by: "Tools and applications that allow visualization capabilities to ensure that operating personnel have situational awareness of the BES" Does this require the same functionality at the backup control center that is available at the primary control center, for example, a video wall?</p> <p>E.ON U.S. requests that the SDT specify if requirement 6 requires data communications be independent for 100% of the RTUs brought back via SCADA or just those RTUs located at "Critical Facilities."</p> <p>E.ON U.S. believes that R4 and M4 should be reworded to clarify that a backup control facility does not require staffing 24x7 by certified operators unless performing as the primary control center.</p>
Charles A. Freibert	Louisville Gas and Electric Co.	3	Negative	<p>E.ON U.S. requests that the SDT clarify what is meant in Requirement 1.2.1 by: "Tools and applications that allow visualization capabilities that ensure that operating personnel have situational awareness of the BES" Does this require the same functionality at the backup control center that is available at the primary control center, for example, a video wall?</p> <p>E.ON U.S. requests that the SDT specify if requirement 6 requires data communications be independent for 100% of the RTUs brought back via SCADA or just those RTUs located at "Critical Facilities."</p> <p>E.ON U.S. believes that R4 and M4 should be reworded to clarify that a backup control facility does not require staffing 24x7 unless contracting for backup services.</p>
Charlie Martin	Louisville Gas and Electric Co.	5	Negative	<p>E.ON U.S. requests that the SDT clarify what is meant in Requirement 1.2.1 by: "Tools and applications that allow visualization capabilities the ensure that operating personnel have situational awareness of the BES" Does this require the same functionality at the backup control center that is available at the primary control center, for example, a video wall?</p> <p>E.ON U.S. requests that the SDT specify if requirement 6 requires data communications be independent for 100% of the RTUs brought back via SCADA or just those RTUs located at "Critical Facilities."</p> <p>E.ON U.S. believes that R4 and M4 should be reworded to clarify that a backup control facility</p>

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				does not require staffing 24x7 unless contracting for backup services.
Daryn Barker	Louisville Gas and Electric Co.	6	Negative	<p>E.ON U.S. requests that the SDT clarify what is meant in Requirement 1.2.1 by: "Tools and applications that allow visualization capabilities the ensure that operating personnel have situational awareness of the BES" Does this require the same functionality at the backup control center that is available at the primary control center, for example, a video wall?</p> <p>E.ON U.S. requests that the SDT specify if requirement 6 requires data communications be independent for 100% of the RTUs brought back via SCADA or just those RTUs located at "Critical Facilities."</p> <p>E.ON U.S. believes that R4 and M4 should be reworded to clarify that a backup control facility does not require staffing 24x7 unless contracting for backup services.</p>

Response: R 1.2.1: The SDT intends that there is sufficient backup functionality so that the operators should have within their back-up capabilities enough functionality that the operators have situational awareness, but this does not mean it must be in the same format as the primary facility, to enable reliable operation of the BES and satisfy all standards applicable to the Registered Entity. Requirement R1, part 1.2.1 has been revised to provide clarity in this regard.

R1, part 1.2.1: Tools and applications to ensure that operating personnel have situational awareness of the BES.

R6: The intent of the requirement is that you can't depend on your primary facility for adequate functionality at your backup facility/functionality (or vice versa) for compliance to the Reliability Standards. This means that nothing at your backup facility/functionality can depend on anything at your primary facility for any item that would be required for you to maintain compliance with all applicable Reliability Standards at your backup facility/functionality (or vice versa). The requirement is not intended to encompass equipment typically located outside of the control center such as RTUs. Requirement R6 has been revised to provide additional clarity on this point (with corresponding changes to Measure M6, data retention, and the VSLs).

R6. Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have primary and backup capabilities that do not depend on each other for the functionality required to maintain compliance with Reliability Standards.

R4: It is the intent of Requirement R4 that when the backup facility is activated it then be staffed by certified operators. The SDT has clarified this intent in a revised Requirement R4 (with corresponding changes to Measure M4, data retention, and the VSLs).

R4. Each Balancing Authority and Transmission Operator shall have backup functionality (provided either through a facility or contracted services staffed by applicable certified operators when control has been transferred to the backup functionality location) that includes monitoring, control, logging, and alarming sufficient for maintaining compliance with all Reliability Standards that depend on a Balancing Authority and Transmission Operator's primary control center functionality respectively. To avoid requiring tertiary functionality, backup functionality is not required during:

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Robert Martinko	FirstEnergy Energy Delivery	1	Negative	<p>FirstEnergy appreciates the hard work put forth in this standards development effort. We feel that the standard proposed is a significant improvement over the existing Version 0 standard. However, as per our following explanation, we must vote Negative due to the ambiguity that still remains in one of the requirements. Requirement R6 states: "Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have primary and backup capabilities that can independently maintain the functionality required to maintain compliance with Reliability Standards." This requirement is ambiguous and subject to varying interpretations regarding the phrase "can independently maintain" which could include the need for redundancy of RTU's and their associated communications equipment. We understand that the team tried to alleviate this specific concern with the latest revision to R6, but the requirement can still be misinterpreted. We suggest a change to the requirement as follows: "R6. Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have primary and back-up capabilities that do not depend on each other to maintain operational functionality in accordance with the applicable NERC Reliability Standards."</p>
Joanne Kathleen Borrell	FirstEnergy Solutions	3	Negative	<p>FirstEnergy appreciates the hard work put forth in this standards development effort. We feel that the standard proposed is a significant improvement over the existing Version 0 standard. However, as per our following explanation, we must vote Negative due to the ambiguity that still remains in one of the requirements. Requirement R6 states: "Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have primary and backup capabilities that can independently maintain the functionality required to maintain compliance with Reliability Standards." This requirement is ambiguous and subject to varying interpretations regarding the phrase "can independently maintain" which could include the need for redundancy of RTU's and their associated communications equipment. We understand that the team tried to alleviate this specific concern with the latest revision to R6, but the requirement can still be misinterpreted. We suggest a change to the requirement as follows: "R6. Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have primary and back-up capabilities that do not depend on each other to maintain operational functionality in accordance with the applicable NERC Reliability Standards."</p>

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Douglas Hohlbaugh	Ohio Edison Company	4	Negative	FirstEnergy appreciates the hard work put forth in this standards development effort. We feel that the standard proposed is a significant improvement over the existing Version 0 standard. However, as per our following explanation, we must vote Negative due to the ambiguity that still remains in one of the requirements. Requirement R6 states: "Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have primary and backup capabilities that can independently maintain the functionality required to maintain compliance with Reliability Standards." This requirement is ambiguous and subject to varying interpretations regarding the phrase "can independently maintain" which could include the need for redundancy of RTU's and their associated communications equipment. We understand that the team tried to alleviate this specific concern with the latest revision to R6, but the requirement can still be misinterpreted. We suggest a change to the requirement as follows: "R6. Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have primary and back-up capabilities that do not depend on each other to maintain operational functionality in accordance with the applicable NERC Reliability Standards."
Mark S Travaglianti	FirstEnergy Solutions	6	Negative	FirstEnergy appreciates the hard work put forth in this standards development effort. We feel that the standard proposed is a significant improvement over the existing Version 0 standard. However, as per our following explanation, we must vote Negative due to the ambiguity that still remains in one of the requirements. Requirement R6 states: "Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have primary and backup capabilities that can independently maintain the functionality required to maintain compliance with Reliability Standards." This requirement is ambiguous and subject to varying interpretations regarding the phrase "can independently maintain" which could include the need for redundancy of RTU's and their associated communications equipment. We understand that the team tried to alleviate this specific concern with the latest revision to R6, but the requirement can still be misinterpreted. We suggest a change to the requirement as follows: "R6. Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have primary and back-up capabilities that do not depend on each other to maintain operational functionality in accordance with the applicable NERC Reliability Standards."

Response: R6: The intent of the requirement is that you can't depend on your primary facility for adequate functionality at your backup facility/functionality (or vice versa) for compliance to the Reliability Standards. This means that nothing at your backup facility/functionality can depend on anything at your primary facility for any item that would be required for you to maintain compliance with all applicable Reliability Standards at your backup facility/functionality (or vice versa). The requirement is not intended to encompass equipment typically located outside of the control center such as RTUs. Requirement R6 has been revised to provide additional clarity on this point (with corresponding changes to Measure M6, data retention, and the VSLs).

R6. Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have primary and backup capabilities that do not depend on each other for the functionality required to maintain compliance with Reliability Standards.

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Gregory L Pieper	Xcel Energy, Inc.	1	Negative	In R1.1, we feel the use of the phrase “prolonged period of time” is unnecessary and misleading. Backup functionality should be required for as long as the primary control center is not available. There should be no indication of a time frame established in the standard, whether prolonged or short. We recommend removal of “for a prolonged period of time” from R1.1 in order for this to be clear and concise.
Michael Ibold	Xcel Energy, Inc.	3	Negative	In R1.1, we feel the use of the phrase “prolonged period of time” is unnecessary and misleading. Backup functionality should be required for as long as the primary control center is not available. There should be no indication of a time frame established in the standard, whether prolonged or short. We recommend removal of “for a prolonged period of time” from R1.1 in order for this to be clear and concise.
Liam Noailles	Northern States Power Co.	5	Negative	In R1.1, we feel the use of the phrase “prolonged period of time” is unnecessary and misleading. Backup functionality should be required for as long as the primary control center is not available. There should be no indication of a time frame established in the standard, whether prolonged or short. We recommend removal of “for a prolonged period of time” from R1.1 in order for this to be clear and concise.
David F. Lemmons	Xcel Energy, Inc.	6	Negative	In R1.1, we feel the use of the phrase “prolonged period of time” is unnecessary and misleading. Backup functionality should be required for as long as the primary control center is not available. There should be no indication of a time frame established in the standard, whether prolonged or short. We recommend removal of “for a prolonged period of time” from R1.1 in order for this to be clear and concise.
<p>Response: R1.1: The SDT was following the language in FERC’s directive. The FERC directive per Order 693 required that the backup “<i>be capable of operating for a prolonged period of time, generally defined by the time it takes to restore the primary control center</i>”. However, the SDT agrees that additional clarity could be provided and has revised Requirement R1, part 1.1 accordingly.</p> <p>R1, part 1.1: The location and method of implementation for providing backup functionality for the time it takes to restore the primary control center functionality.</p>				
Garry Baker	JEA	3	Negative	JEA feels that R1.4 should be an operating process as opposed to an operating procedure based on the definition in the NERC Glossary.
<p>Response: The intent is that the specific steps to be taken to implement the Operating Plan be described. This is a procedure as opposed to a process as defined in the NERC Glossary. No change made.</p>				

Voter	Entity	Segment	Vote	Comment
Joseph G. DePoorter	Madison Gas and Electric Co.	4	Negative	MGE disagrees with this balloted standard due to the following issues, a) R1.2.5 is redundant with CIP-002-1, R1.2.1 where Critical asset identification contains backup control centers, b) R1.5 requires a two hour time frame for an entity to fully implement the backup functionality, this may not be enough time for entities that may be impacted by hurricanes, floods, ect, c) R6 has an addition of "can independently maintain the functionality required to maintain compliance with reliability standards" this may be interpreted as requiring dual rtu's, breakers, lines, scada systems, ect.

Response: The items listed in Requirement R1, part 1.2 are simply a list of items that must be addressed in the entity's Operating Plan in the event that an entity's primary control center functionality is lost. CIP-002-1, Requirement R1.2.1 requires the entity to consider its control centers when developing a methodology for identification of critical assets so no duplication occurs. No change made.

R1.5: The SDT has vetted the two-hour time frame through multiple industry comment periods and the vast majority of the industry has indicated acceptance of this value. No change made.

R6: The intent of the requirement is that you can't depend on your primary facility for adequate functionality at your backup facility/functionality (or vice versa) for compliance to the Reliability Standards. This means that nothing at your backup facility/functionality can depend on anything at your primary facility for any item that would be required for you to maintain compliance with all applicable Reliability Standards at your backup facility/functionality (or vice versa). The requirement is not intended to encompass equipment typically located outside of the control center such as RTUs. Requirement R6 has been revised to provide additional clarity on this point (with corresponding changes to Measure M6, data retention, and the VSLs).

R6. Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have primary and backup capabilities that do not depend on each other for the functionality required to maintain compliance with Reliability Standards.

Terry L Baker	Platte River Power Authority	3	Negative	PRPA does not feel that the Operating Plan should include a summary description of the Physical and Cyber security elements required to support backup functionality. This should already be covered in meeting the CIP standards and is an unnecessary duplication. (R1.2.5) PRPA feels that we understand the intent of R.4 but the requirement is written in a manner that could lead you to believe the backup center would be dependent on primary control center functionality for "maintaining compliance with all Reliability Standards". PRPA does not see the reliability value in being required to approve our Operating Plan after completing the annual review. (R.5)
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Response: The items listed in Requirement R1, part 1.2 are simply a list of items that must be addressed in the entity's Operating Plan in the event that an entity's primary control center functionality is lost. CIP-002-1, Requirement R1.2.1 requires the entity to consider its control centers when developing a methodology for identification of critical assets so no duplication occurs. No change made.

R4: The intent is that the backup functionality must support the reliable operation of the BES and comply with the applicable Reliability Standards. However, the standard addresses only those functions required to support reliability of the BES. Peripheral functionality such as accounting may reside in a primary control

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<p>center but they are not the concern of this standard. Only those functions that support reliability must be 'backed up'. The quoted phrase is out of context and should include the words following that phrase to provide the proper context: "...maintaining compliance with all Reliability Standards that depend on a Balancing Authority and Transmission Operator's primary control center functionality..." This now provides the proper context for describing the intent of the SDT. No change made.</p> <p>R5: The intent is to ensure that management responsible for compliance as identified in the corporate compliance program is aware of changes to the Operating Plan and approves them. No change made.</p>				
Jonathan Appelbaum	Long Island Power Authority	1	Negative	<p>R1.4 should be modified such that the Operating Plan provides 1. The NERC Certified Operator the authority to implement the Operating Plan; and 2. An Operating Process is provided describing the parameters to consider for the implementation of the Operating Plan. Concern is an Auditor will want to see a Procedure as NERC defines an Operating Procedure. That is a specific step by step process that the NERC Certified Operator takes to decide when to implement the Operating Plan. An Operating Process is more appropriate terminology. Also note that R1.3 and 1.6 uses an Operating Process not a Procedure.</p>
<p>Response: The authority to implement the Operating Plan is up to the Registered Entity to identify in the procedure. The intent is that the specific steps to be taken to implement the Operating Plan be described. This is a procedure as opposed to a process as defined in the NERC Glossary. No change made.</p>				
Kenneth Goldsmith	Alliant Energy Corp. Services, Inc.	4	Negative	<p>Requirement 1.1 - We believe the statement should say for as long as required, not for a prolonged period of time.</p> <p>Requirement 1.5 - We believe 2 hours to get the backup system totally functioning is unreasonable, especially if the backup is located a significant distance from the primary. We believe the standard should allow an alternative plan (manual dispatch), and have the backup operating within a reasonable time after the alternative plan is operating.</p> <p>Requirement 6 - We are concerned that the phrase "independently maintain" could be interpreted to require complete redundancy from the sensing device all the way to the backup center. This needs to be clarified.</p>
<p>Response: R1.1: The SDT was following the language in FERC's directive. The FERC directive per Order 693 required that the backup "<i>be capable of operating for a prolonged period of time, generally defined by the time it takes to restore the primary control center</i>". However, the SDT agrees that additional clarity could be provided and has revised Requirement R1, part 1.1 accordingly.</p> <p>R1, part 1.1: The location and method of implementation for providing backup functionality for the time it takes to restore the primary control center functionality.</p> <p>R1.5: The SDT has vetted the two-hour time frame through multiple industry comment periods and the vast majority of the industry has indicated acceptance of this value. No change made.</p> <p>R6: The intent of the requirement is that you can't depend on your primary facility for adequate functionality at your backup facility/functionality (or vice versa) for</p>				

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<p>compliance to the Reliability Standards. This means that nothing at your backup facility/functionality can depend on anything at your primary facility for any item that would be required for you to maintain compliance with all applicable Reliability Standards at your backup facility/functionality (or vice versa). The requirement is not intended to encompass equipment typically located outside of the control center such as RTUs. Requirement R6 has been revised to provide additional clarity on this point (with corresponding changes to Measure M6, data retention, and the VSLs).</p> <p>R6. Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have primary and backup capabilities that do not depend on each other for the functionality required to maintain compliance with Reliability Standards.</p>				
James R. Keller	Wisconsin Electric Power Marketing	3	Negative	<p>Specific Comments: R1. 1.2.1. Tools and applications that allow visualization capabilities that ensure that operating personnel have situational awareness of the BES. Comment: R1.2.1 should be removed. "Situational Awareness" is a state of knowledge, not a measurable state of a control room facility. Personal background and other factors dictate the minimum information an operator needs to understand the state of the BES, making this a subjective requirement. We cannot ensure the state of mind of operators; only provide tools to assist in the development of awareness.</p> <p>1.6.2. Actions to manage the risk to the BES during the transition from primary to backup functionality. Comment: The latter part of R1.6.2 is a departure from the main R1.6, and planned and unplanned outages are addressed in R3 for RCs, and R4 for BAs and TOPs. Should be modified as shown above.</p> <p>R4. Each Balancing Authority and Transmission Operator shall have backup functionality (provided either through a facility or contracted services staffed by applicable certified operators) that includes monitoring, control, logging, and alarming. To avoid requiring tertiary functionality, backup functionality is not required during: [Violation Risk Factor = Medium] [Time Horizon = Operations Planning]</p> <p>Comment: The statement "sufficient for maintaining compliance with all Reliability Standards" is subjective and should be remove as shown above.</p> <p>R5. 5.1. An update and approval of the Operating Plan for backup functionality shall take place within sixty calendar days of any changes in capabilities described in Requirement R1. Comment: R5.1 is an unnecessary administrative burden and is further highly subjective in the interpretation of what constitutes "any change in capability." These types of revisions are addressed by the annual review in requirement 5. R5.1 should be removed.</p> <p>R6. Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have backup capabilities that are independent from the primary control center. [Violation Risk Factor = Medium] [Time Horizon = Operations Planning] Comment: The project title is "Back-up Facilities Project 2006-04," the SAR does not mention primary control centers, and the standard is titled "Loss of Control Center Functionality." Therefore, requirements placed on primary control centers are over reaching, and do not belong here.</p>

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				<p>Comment: "Functionality required to maintain compliance with Reliability Standards" is redundant with other standard requirements. This is a minor variation on requiring compliance to Reliability Standards. R6 should be modified as shown above.</p> <p>M4. Each Balancing Authority and Transmission Operator shall provide dated evidence that its backup functionality (provided either through a facility or contracted services staffed by applicable certified operators) includes monitoring, control, logging, and alarming. Comment: The statement "sufficient for maintaining compliance with all Reliability Standards" is subjective and should be removed as shown above.</p> <p>M6. Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have dated evidence that its backup capabilities are independent from the primary control center in accordance with Requirement R6. Comment: The project title is "Back-up Facilities Project 2006-04," the SAR does not mention primary control centers, and the standard is titled "Loss of Control Center Functionality." Therefore, requirements placed on primary control centers are over reaching, and do not belong here. M6 should be modified as shown above.</p>
Anthony Jankowski	Wisconsin Energy Corp.	4	Negative	<p>Specific Comments: R1. 1.2.1. Tools and applications that allow visualization capabilities that ensure that operating personnel have situational awareness of the BES. Comment: R1.2.1 should be removed. "Situational Awareness" is a state of knowledge, not a measurable state of a control room facility. Personal background and other factors dictate the minimum information an operator needs to understand the state of the BES, making this a subjective requirement. We cannot ensure the state of mind of operators; only provide tools to assist in the development of awareness.</p> <p>1.6.2. Actions to manage the risk to the BES during the transition from primary to backup functionality. Comment: The latter part of R1.6.2 is a departure from the main R1.6, and planned and unplanned outages are addressed in R3 for RCs, and R4 for BAs and TOPs. Should be modified as shown above.</p> <p>R4. Each Balancing Authority and Transmission Operator shall have backup functionality (provided either through a facility or contracted services staffed by applicable certified operators) that includes monitoring, control, logging, and alarming. To avoid requiring tertiary functionality, backup functionality is not required during: [Violation Risk Factor = Medium] [Time Horizon = Operations Planning]</p> <p>Comment: The statement "sufficient for maintaining compliance with all Reliability Standards" is subjective and should be remove as shown above.</p> <p>R5. 5.1. An update and approval of the Operating Plan for backup functionality shall take place within sixty calendar days of any changes in capabilities described in Requirement R1. Comment: R5.1 is an unnecessary administrative burden and is further highly subjective in the</p>

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				<p>interpretation of what constitutes “any change in capability.” These types of revisions are addressed by the annual review in requirement 5. R5.1 should be removed.</p> <p>R6. Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have backup capabilities that are independent from the primary control center. [Violation Risk Factor = Medium] [Time Horizon = Operations Planning] Comment: The project title is “Back-up Facilities Project 2006-04,” the SAR does not mention primary control centers, and the standard is titled “Loss of Control Center Functionality.” Therefore, requirements placed on primary control centers are over reaching, and do not belong here.</p> <p>Comment: “Functionality required to maintain compliance with Reliability Standards” is redundant with other standard requirements. This is a minor variation on requiring compliance to Reliability Standards. R6 should be modified as shown above.</p> <p>M4. Each Balancing Authority and Transmission Operator shall provide dated evidence that its backup functionality (provided either through a facility or contracted services staffed by applicable certified operators) includes monitoring, control, logging, and alarming. Comment: The statement “sufficient for maintaining compliance with all Reliability Standards” is subjective and should be removed as shown above.</p> <p>M6. Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have dated evidence that its backup capabilities are independent from the primary control center in accordance with Requirement R6. Comment: The project title is “Back-up Facilities Project 2006-04,” the SAR does not mention primary control centers, and the standard is titled “Loss of Control Center Functionality.” Therefore, requirements placed on primary control centers are over reaching, and do not belong here. M6 should be modified as shown above.</p>
Linda Horn	Wisconsin Electric Power Co.	5	Negative	<p>Specific Comments: R1. 1.2.1. Tools and applications that allow visualization capabilities that ensure that operating personnel have situational awareness of the BES. Comment: R1.2.1 should be removed. “Situational Awareness” is a state of knowledge, not a measurable state of a control room facility. Personal background and other factors dictate the minimum information an operator needs to understand the state of the BES, making this a subjective requirement. We cannot ensure the state of mind of operators; only provide tools to assist in the development of awareness.</p> <p>1.6.2. Actions to manage the risk to the BES during the transition from primary to backup functionality. Comment: The latter part of R1.6.2 is a departure from the main R1.6, and planned and unplanned outages are addressed in R3 for RCs, and R4 for BAs and TOPs. Should be modified as shown above.</p> <p>R4. Each Balancing Authority and Transmission Operator shall have backup functionality (provided either through a facility or contracted services staffed by applicable certified</p>

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				<p>operators) that includes monitoring, control, logging, and alarming. To avoid requiring tertiary functionality, backup functionality is not required during: [Violation Risk Factor = Medium] [Time Horizon = Operations Planning]</p> <p>Comment: The statement “sufficient for maintaining compliance with all Reliability Standards” is subjective and should be remove as shown above.</p> <p>R5. 5.1. An update and approval of the Operating Plan for backup functionality shall take place within sixty calendar days of any changes in capabilities described in Requirement R1. Comment: R5.1 is an unnecessary administrative burden and is further highly subjective in the interpretation of what constitutes “any change in capability.” These types of revisions are addressed by the annual review in requirement 5. R5.1 should be removed.</p> <p>R6. Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have backup capabilities that are independent from the primary control center. [Violation Risk Factor = Medium] [Time Horizon = Operations Planning] Comment: The project title is “Back-up Facilities Project 2006-04,” the SAR does not mention primary control centers, and the standard is titled “Loss of Control Center Functionality.” Therefore, requirements placed on primary control centers are over reaching, and do not belong here.</p> <p>Comment: “Functionality required to maintain compliance with Reliability Standards” is redundant with other standard requirements. This is a minor variation on requiring compliance to Reliability Standards. R6 should be modified as shown above.</p> <p>M4. Each Balancing Authority and Transmission Operator shall provide dated evidence that its backup functionality (provided either through a facility or contracted services staffed by applicable certified operators) includes monitoring, control, logging, and alarming. Comment: The statement “sufficient for maintaining compliance with all Reliability Standards” is subjective and should be removed as shown above.</p> <p>M6. Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have dated evidence that its backup capabilities are independent from the primary control center in accordance with Requirement R6. Comment: The project title is “Back-up Facilities Project 2006-04,” the SAR does not mention primary control centers, and the standard is titled “Loss of Control Center Functionality.” Therefore, requirements placed on primary control centers are over reaching, and do not belong here. M6 should be modified as shown above.</p>

Response: R 1.2.1: The SDT intends that there is sufficient backup functionality so that the operators should have within their back-up capabilities enough functionality that the operators have situational awareness, but this does not mean it must be in the same format as the primary facility, to enable reliable operation of the BES and satisfy all standards applicable to the Registered Entity. Requirement R1, part 1.2.1 has been revised to provide clarity in this regard.

R1, part 1.2.1: Tools and applications to ensure that operating personnel have situational awareness of the BES.

Voter	Entity	Segment	Vote	Comment
<p>R1.6.2: This requirement is to ensure that there is a plan to mitigate the risk during transition and outages. Since no such plan is mentioned in Requirements R3 & R4 there is no redundancy or contradiction. No change made.</p> <p>R4: The intent is that the backup functionality must support the reliable operation of the BES and comply with the applicable Reliability Standards. However, the standard addresses only those functions required to support reliability of the BES. Peripheral functionality such as accounting may reside in a primary control center but they are not the concern of this standard. Only those functions that support reliability must be 'backed up'. No change made.</p> <p>R 5.1: The SDT feels that waiting one year to track changes to the Operating Plan is unrealistic for such an important plan. Sixty days should be sufficient time to incorporate changes to the plan. The use of the term 'any' can sometimes be considered as too broad for inclusion in a standard. However, in this case, 'any' is bound by the parts of Requirement R1 which lay out what specific information is required in the Operating Plan. Therefore, in this context, 'any' is not too broad and is the appropriate term to use. No change made.</p> <p>R6: There are no requirements for the primary facility in this standard. The intent of the requirement is that you can't depend on your primary facility for adequate functionality at your backup facility/functionality (or vice versa) for compliance to the Reliability Standards. This means that nothing at your backup facility/functionality can depend on anything at your primary facility for any item that would be required for you to maintain compliance with all applicable Reliability Standards at your backup facility/functionality (or vice versa). The requirement is not intended to encompass equipment typically located outside of the control center such as RTUs. Requirement R6 has been revised to provide additional clarity on this point (with corresponding changes to Measure M6, data retention, and the VSLs).</p> <p style="padding-left: 40px;">R6. Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have primary and backup capabilities that do not depend on each other for the functionality required to maintain compliance with Reliability Standards.</p> <p>M4: See response to R4 above.</p> <p>M6: See response to R6 above.</p>				
Jalal (John) Babik	Dominion Resources, Inc.	3	Negative	The reason is that the revised language that was supposed to eliminate the need for a tertiary backup facility is so poorly worded that it actually creates an unintentional requirement for a tertiary facility if a planned outage of the primary or secondary facility exceeds two weeks. We commented on this, and the SDT response was that, as "standard operating procedure", an outage of greater than two weeks is supposed to be reported to the Region along with a mitigation plan. We cannot find this reporting requirement in the proposed standard or any other standard.
<p>Response: The NERC compliance process requires that if a standard requirement cannot be met the Registered Entity must report this to the Regional Entity and explain why it cannot be met along with a plan for mitigating the non-compliance. No change made.</p>				

Voter	Entity	Segment	Vote	Comment
Lee Schuster	Florida Power Corporation	3	Negative	The Standard Drafting Team has clarified many requirements in its responses to industry questions/comments. However, some of these clarifications were not added to the standard. Examples include "prolonged period of time" and "annual test." This has resulted in repeated questions/comments across draft revisions because the clarifications were only in the SDT's responses from previous revisions. These clarifications should either be (1) added to the standard or (2) included in a FAQ document for the standard. Otherwise, these same questions will persist during audits, which will potentially lead to inconsistent adherence to the standard and inconsistent interpretation during audits.
Sam Waters	Progress Energy Carolinas	3	Negative	The Standard Drafting Team has clarified many requirements in its responses to industry questions/comments. However, some of these clarifications were not added to the standard. Examples include "prolonged period of time" and "annual test." This has resulted in repeated questions/comments across draft revisions because the clarifications were only in the SDT's responses from previous revisions. These clarifications should either be (1) added to the standard or (2) included in a FAQ document for the standard. Otherwise, these same questions will persist during audits, which will potentially lead to inconsistent adherence to the standard and inconsistent interpretation during audits.
Wayne Lewis	Progress Energy Carolinas	5	Negative	The Standard Drafting Team has clarified many requirements in its responses to industry questions/comments. However, some of these clarifications were not added to the standard. Examples include "prolonged period of time" and "annual test." This has resulted in repeated questions/comments across draft revisions because the clarifications were only in the SDT's responses from previous revisions. These clarifications should either be (1) added to the standard or (2) included in a FAQ document for the standard. Otherwise, these same questions will persist during audits, which will potentially lead to inconsistent adherence to the standard and inconsistent interpretation during audits.
<p>Response: The SDT believes it has attempted to clarify issues raised during all comment periods. However, in response to industry comments requesting additional clarity, the SDT has revised Requirement R1, part 1.1 ("prolonged period of time").</p> <p>R1, part 1.2.1: Tools and applications to ensure that operating personnel have situational awareness of the BES.</p> <p>However, with regard to 'annual': standards procedure is not to 'define' terms that are commonly used or where the term is readily available in a dictionary. Annual is defined in Webster's as "occurring or happening every year or once a year". The SDT confirms that this is the meaning intended. No change made.</p>				
Terry Harbour	MidAmerican Energy Co.	1	Negative	The standards needs clarification to allow for natural disasters where it may take more than 2 hours to transport personnel to the backup control center such as a flood. Natural disasters can easily jam roads.

Voter	Entity	Segment	Vote	Comment
<p>Response: A standard cannot handle any and all possible scenarios but should instead address what is reasonable and what the requirement should be for reliable operation of the bulk power system. In cases such as described here, Registered Entities would need to notify the Regional Entity of the situation as it occurs. The SDT has vetted the two-hour time frame through multiple industry comment periods and the vast majority of the industry has indicated acceptance of this value. No change made.</p>				
Peggy Abbadini	Power Energy Group LLC	8	Negative	There is still interpretation issues on what will be expected for compliance concerning CIP Standards when the language in R4 states "maintaining compliance with all Reliability Standards".
<p>Response: The CIP standards apply to the backup as well as the primary facility. There should be no confusion here. No change made.</p>				
Larry Akens	Tennessee Valley Authority	1	Negative	TVA believes that the word "any" in Requirement 5.1 is too broad.
<p>Response: The use of the term 'any' can sometimes be considered as too broad for inclusion in a standard. However, in this case, 'any' is bound by the parts of Requirement R1 which lay out what specific information is required in the Operating Plan. Therefore, in this context, 'any' is not too broad and is the appropriate term to use. No change made.</p>				
Dan R Schoenecker	Midwest Reliability Organization	10	Negative	Various concerns exist among the MRO NSRS membership.
<p>Response: The comment is not specific regarding the MRO NSRS concerns. No change made.</p>				
Martin Bauer	U.S. Bureau of Reclamation	5	Negative	We are inclined to vote against with the standard following comment "Documentation concerning changes to the standards must be communicated through an open and transparent process. It is troubling to find that the reason for a change will not be produced during the standard review process but is intended to be submitted after the fact. This practice should be avoided. This is in reference to the statement "The Standards Committee (SC) instructed the SDT to remove R3 after the SC was told by NERC Staff that the requirements in R3 are addressed through compliance administration processes and the industry is already being audited in accordance with these processes..."
<p>Response: The majority of the comments received to this issue in posting three were to remove the requirement. A minority of commenters pointed out a possible reliability gap that caused the SDT to retain the requirement despite the majority comments. Subsequently, the Standards Committee instructed the SDT to remove the requirement. If there is a problem with the process that was followed, comments should be addressed to the Standards Committee.</p>				

Voter	Entity	Segment	Vote	Comment
David A. Lapinski	Consumers Energy	3	Negative	We believe that the old R3 should be removed. R6 lacks a definitive statement as to what "independently maintain" means. Clarification is needed.
James B Lewis	Consumers Energy	5	Negative	We believe that the old R3 should be removed. R6 lacks a definitive statement as to what "independently maintain" means. Clarification is needed.
<p>Response: R3: The requirement was removed.</p> <p>R6: There are no requirements for the primary facility in this standard. The intent of the requirement is that you can't depend on your primary facility for adequate functionality at your backup facility/functionality (or vice versa) for compliance to the Reliability Standards. This means that nothing at your backup facility/functionality can depend on anything at your primary facility for any item that would be required for you to maintain compliance with all applicable Reliability Standards at your backup facility/functionality (or vice versa). The requirement is not intended to encompass equipment typically located outside of the control center such as RTUs. Requirement R6 has been revised to provide additional clarity on this point (with corresponding changes to Measure M6, data retention, and the VSLs).</p> <p>R6. Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have primary and backup capabilities that do not depend on each other for the functionality required to maintain compliance with Reliability Standards.</p>				
Richard L. Koch	Nebraska Public Power District	1	Affirmative	The implementation schedule should be extended from 24 months to 30-36 months to allow adequate time to obtain quotes, review and select vendors to engineer, procure, and construct back-up facilities that meet the new requirements.
<p>Response: The SDT tried to provide a reasonable time period and this timeframe was vetted by the industry through the comment process. No change made.</p>				
Carter B Edge	SERC Reliability Corporation	10	Affirmative	While the standard still has some specific areas for improvement (clarity around tertiary operating facilities, delegation of operating tasks, and redundant communications), the proposed standard, on balance, will present an increased capability in reliable operations.
<p>Response: Thank you for your support.</p>				
Terry Bilke	Midwest ISO, Inc.	2	Abstain	We are turning the ballot over to another person and will cast our official position during recirculation.
<p>Response: The standard is now going to go through another posting period.</p>				