

Consideration of Comments on Initial Ballot of System Restoration and Blackstart Standards (Project 2006-03)

Summary Consideration:

There were three main themes to the comments supplied with the initial balloting.

1. Reliability Coordinator approval of the restoration plan – Order 693 required that the Reliability Coordinator must be involved in the development and approval of the Transmission Operators’ restoration plans.
2. Timing requirements of Reliability Coordinator for the Transmission Operators plans - This is a potential start-up problem. The Reliability Coordinators and Transmission Operators will have to coordinate. Once you go through the implementation process, you will always have an approved plan.
3. Training – Order 693 required that restoration training be included in the restoration standards.

The SDT believes that it has addressed all of the comments and that no changes are required to the standards. Hopefully these responses have added clarity and will allow the entities involved to vote in the affirmative on the recirculation ballot.

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

Voter	Entity	Segment	Vote	Comment
Kirit S. Shah	Ameren Services	1	Negative	(1)The RC has too much authority and it is ambiguous authority at best regarding the approval of TO plans.
Mark Peters		3		(2)The TOP should submit plans to the RC. The RC should verify that the TOP

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

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				<p>plans do not conflict with other’s plans. Then the RC should “accept” the plan. Either change the word approve so that it says “approve the plan as it relates to being absent of conflict with other’s plans” or change the word to accept.</p> <p>(3)Also, the BAL-006 talks about an RC plan. But it is unclear if the RC plan has the same detail as a TOP plan or is really a plan on how to connect up islands. Clearly it should obvious we don’t want the RC and TOP to cover the same stuff.</p> <p>(4)EOP-001;VSLs; R1 does not require agreements with all adjacent BA’s as the VSLs suggest</p> <p>(5)EOP-001; R4 VSL is not clear what the term “complied with” means in the VSL. R4 states that “the applicable elements” should be included.</p> <p>(6)EOP-005; R5; is the reference to the TO’s or RC’s plan? Either could be read into the Requirement; please clarify.</p> <p>(7)EOP-005, R6.1: A further clarification is needed for what is meant by “dynamic capability”. For example, is a motor starting calculations/simulation ok or a time-domain simulation required?</p>
<p>Response: (1) In Order 693, the Commission proposal is that the Reliability Coordinators must be involved in the development and approval of the restoration plans. The SDT feels that the approval of the plans is consistent with the role of the Reliability Coordinator as defined in the Functional Model.</p> <p>(2) In Order 693, the Commission proposal is that the Reliability Coordinators must be involved in the development and approval of the restoration plans. The SDT feels that the approval of the plans is consistent with the role of the Reliability Coordinator as defined in the Functional Model.</p> <p>(3) BAL-006 is about inadvertent interchange. We assume you are referring to EOP-006 here. In EOP-006-2, the Reliability Coordinator oversees and coordinates restoration activities regardless of whether it is a blackstart condition or islanding. In EOP-005-2, the Transmission Operator restores the System from a blackstart condition utilizing Blackstart Resources under the aegis of the Reliability Coordinator. There should be no confusion as to responsibilities and no entity should be duplicating the efforts of another.</p> <p>(4) The scope of this project only permitted the deletion of Requirement R2.4 pertaining to restoration plans. Any further revision is beyond scope and will require a separate SAR or the advancement of Project 2009-03 which is to deal with the revision of EOP-001.</p>				

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<p>(5) The scope of this project only permitted the deletion of Requirement R2.4 pertaining to restoration plans. Any further revision is beyond scope and will require a separate SAR or the advancement of Project 2009-03 which is to deal with the revision of EOP-001.</p> <p>(6) The plan is the Transmission Operator's plan that has been approved by the Reliability Coordinator. "Its" refers to the Transmission Operator.</p> <p>(7) The SDT assumes you mean dynamic simulations. The standard does not define the type of dynamic simulation, just that it be sufficient to meet the requirements of the Transmission Operator's restoration plan.</p>				
Richard Salgo	Sierra Pacific Power Co.	1	Affirmative	Affirmative, however, I wish to point out an apparent inconsistency between EOP-006 R3 and EOP-005 R3 having to do with the period of review for restoration plans. In the EOP-006, R3, the RC shall review its restoration plan within 13 calendar months of the last review; however in EOP-005, the TO reviews its restoration plan and submits to the RC annually and "on a mutually agreed predetermined schedule". This seems inconsistent, and would appear to lead to having such plans losing synchronism with one another.
<p>Response: The SDT recognizes this is a potential start-up problem and that there are many interacting requirements between EOP-005-2 and EOP-006-2. The Reliability Coordinators and Transmission Operators will have to coordinate during that time period. However, once you go through the implementation process, you will always have an approved plan. Please note that Reliability Coordinators and Transmission Operators are already required to have a restoration plan.</p>				
Paul Rocha	CenterPoint Energy	1	Negative	CenterPoint Energy disagrees with including training requirements in an EOP standard category. NERC Project 2006-01 (PER-005-1 System Personnel Training) is presently addressing training, including system restoration, and CenterPoint Energy believes this where all training issues should be addressed.
<p>Response: In Order 693, the Commission requires the ERO to include personnel training for system restoration in the restoration standards.</p>				
James B Lewis	Consumers Energy	5	Negative	Consumers Energy's Power Generation group offers no comments on EOP-001-2 or EOP-006-2. We vote NO because of the following concerns about EOP-005-2: R1.6: The Transmission Operator must coordinate with the Generator Operator to identify acceptable operating voltage and frequency limits during restoration. Generator underfrequency relaying, including V/Hz, and terminal bus voltage limits impact the restoration. R9: This seems to be some sort of stealth requirement on Generator Owners. Transmission Operators do not necessarily own Black Start resources. Many Black

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				<p>Start resources are owned by Generator Owners.</p> <p>R13: What occurs if the Transmission Operator and Generator Operator cannot come to agreement on the terms and conditions of a Black Start agreement? The Generator Operator may be subject to unreasonable requirements or technically imprudent requests which could result in equipment damage. This, of course, negatively impacts BES reliability.</p> <p>R16: The Transmission Operator should not be unilaterally setting requirements for Generator Operators. The requirements could be set by RROs through some sort of standards development process or should be the subject of negotiation with the groups involved. Having them uniform throughout the reliability region seems best.</p> <p>R17: We believe that reliability standards should not dictate specific training requirements, only that appropriate training is required. We would welcome further discussion on this subject. James B. Lewis, P.E. Executive Engineer Consumers Energy Power Generation E-mail: jblewis@cmsenergy.com</p>
<p>Response: R1.6: This concern is addressed by EOP-005-2, Requirement R13.</p> <p>R9: The SDT has assumed that Blackstart Resources are under the control of the Generator Operator and has not assumed any type of ownership. Multiple requirements and the definition for Blackstart Resource address this concern. If the Transmission Operator and the Generator Operator are under common ownership, there may be more easily accomplished coordination, but this is not assumed.</p> <p>R13: Without an agreement, there is no Blackstart Resource. If the Transmission Operator and Generator Operator can't come to agreement, then the unit is not considered a Blackstart Resource and the Transmission Operator can't include the unit in its plan. The Generator Operator can't be forced into entering into an agreement.</p> <p>R16: Regional Entities may develop standards for Blackstart Resources in their region, but a NERC standard cannot require such a standard. The SDT believes the process described in EOP-005-2 provides a common framework for testing. The Transmission Operator has incentives to make its testing requirements only as stringent as needed to meet the needs of its restoration plan.</p> <p>R17: In Order 693, the Commission noted "that inclusion of periodic system restoration drills and training and review of restoration plans in a system restoration Reliability Standard is the most effective way of achieving the desired goal of ensuring that all participants are trained in system restoration"</p>				
George R. Bartlett	Entergy Corporation	1	Negative	DRAFT DRAFT Entergy Comments for Negative Ballot with Comment System Restoration from Blackstart Resources Standards Project 2006-03 Initial Ballot -

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Stanley M Jaskot	Entergy Corporation	5		Due APRIL 23, 2009
Terri F Benoit	Entergy Services, Inc.	6		<p>IDENTIFICATION OF CRANKING PATH We agree with the draft standard that the Restoration Plan should be a high level restoration philosophy or principles of how a system would be restored based on the conditions and availability of facilities following a disturbance. The standard as written requires strategies, procedures, agreements, limits, etc. However, EOP-005-2 Requirement 1.5 requires the identification of Cranking Paths and initial switching requirements between the Blackstart Resource and the unit(s) to be started. This Requirement should be a procedure for surveying the facilities that are available to establish a Cranking Path at the time the Path is needed. Historical experience of the aftermath of hurricanes, tornados, and earthquakes prove that any pre-established Cranking Path and switching requirements will probably be useless. Low level details of switching and other requirements are more appropriately included in company operating procedures. Because even small changes to the system could make the plan out-dated when such details are required and because of the involved process to gain approvals, we feel the details are best handled in local operating procedures for TOPs, GOPs, etc. This provides for agility in responding to system changes to update plans in a timely and appropriate manner.</p> <p>RECONCILIATION OF RC NON-APPROVAL OF TOP PLAN We feel there needs to be additional requirements included in EOP-005-2 and EOP-006-2 to fully implement the blackstart plan approval process. There are no provisions in the standards for the scenario where the RC fails to approve a TOP plan. The standards speak to mandatory requests for approval and mandatory responses on approval/disapproval/etc. but no details on how to reconcile any issues/disputes so that, ultimately, approval is the end result. Without this, the TOP has incredible compliance exposure. In this scenario, there is an issue of who has the liability for non-compliance. There need to be clear requirements/measures to ensure that the TOP and RC work together in order to work through any issues and reach approval in a timely manner.</p> <p>PROPOSED EFFECTIVE DATES The Proposed Effective Dates call for both standards to be effective "Twenty-four months after the first day of the first calendar quarter following applicable regulatory approval. In those jurisdictions where no regulatory approval is required, all requirements go into effect twenty-</p>

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				<p>four months after Board of Trustees adoption." These effective dates leave the Transmission Operator open to potential compliance violations since completion of the TOP restoration plan is dependent on the restoration plan of the RC and then dependent on approval by the RC. The Proposed Effective Date for the RC restoration plan should be sometime, say six (6) months, before the Effective Date of the TOP restoration plan. The 6 months would be used by the TOP to include the RC plan requirements into the TOP plan and used by the RC to review, get revised and approve the RC plan.</p> <p>CLARIFICATIONS NOT INCLUDED Numerous clarifications were provided by the SDT during their response to comments. In many instances, the SDT response satisfied our concerns. Unfortunately, many of those explanations did not find their way into the standards. We feel that this could cause unnecessary future Requests for Interpretations. Even more troubling, if erroneously interpreted by auditors in the future, the true intent of the standards as written by the SDT experts could be lost.</p> <p>NUMBER OF DRILLS PER YEAR We believe that conducting one (1) System restoration drill per year is needed and should be adequate. Conducting two (2) drills per year, as required in EOP-006-2 R10 and R10.1 is excessive, cost prohibitive and should be changed to one (1) per year.</p>
Matt Wolf	Entergy Services, Inc.	3	Negative	See comments submitted by George Bartlett.
<p>Response: Identification of Cranking Path: The SDT agrees that flexibility must be built into the restoration plans; see EOP-005-2, Requirement R7. The SDT also believes that it is necessary to determine at least one feasible Cranking Path from a Blackstart Resource and the unit(s) to be restarted. It may be a good practice to determine more than one, but the SDT has not made this a requirement.</p> <p>Reconciliation of Reliability Coordinator non-approval of Transmission Operator plan: Both the Transmission Operator and the Reliability Coordinator have timing requirements for submittals and approvals or disapprovals. The two-year implementation plan provides sufficient time to obtain Reliability Coordinator approval of the Transmission Operator's restoration plan. Once there is an approved plan, there is always an approved plan, though it may not be the latest version of the Transmission Operator's plan. EOP-005-2, Requirement R7 provides for additional flexibility.</p> <p>Proposed effective dates: The SDT recognizes this is a start-up problem and that there are many interacting requirements between EOP-005-2 and EOP-006-2. The Reliability Coordinators and Transmission Operators will have to coordinate during that time period. However, once you go through the implementation process, you will always have an approved plan. Please note that Reliability Coordinators and Transmission</p>				

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<p>Operators are already required to have a restoration plan.</p> <p>Clarifications: The SDT feels that it has responded appropriately to all industry comments throughout four different postings by either changing the standards as suggested or responding with a legitimate reason as to why the suggested changes were not made. As an official response to an industry comment, this response is part of the permanent record regarding this standard.</p> <p>Number of drills per year: The SDT does not agree that conducting two drills/exercises annually is excessive given:</p> <ul style="list-style-type: none"> • The need for realistic and credible drills and simulations noted by the US – Canadian Joint Task Force in their report on the August 14, 2003 blackout, and • The leeway to the Reliability Coordinator to determine the scope of drills, exercises, and simulations afforded by EOP 006-2. 				
Robert Martinko	FirstEnergy Energy Delivery	1	Negative	FirstEnergy Corp. appreciates the hard work from the SRB SDT in revising the subject EOP standards, but as presently written, we are voting NEGATIVE based on the following comments.
Joanne Kathleen Borrell	FirstEnergy Solutions	3		1. Our primary concern is with EOP-005-2 requirement R11 regarding training of field switching personnel. As written the requirement is subjective and open to interpretation related to what would be a “unique task”. The standard should more clearly define training expectations related to system restoration so there is no misunderstanding during an audit of this requirement.
Douglas Hohlbaugh	Ohio Edison Company	4		
Mark S Travaglianti	FirstEnergy Solutions	6		<p>An additional concern is the annual two hour training requirement. The new PER-005 standard directs a Systematic Approach to Training that utilizes methods to determine the proper amount of training needed for each employee. The training needs for a new employee versus a seasoned employee will be different and the two hour requirement appears to be arbitrarily set. The requirement seems to go beyond the FERC directives provided in Order 693. FE believes the intent of the FERC directive in paragraph 630 in regards to “identifies time frames for training” is associated with the periodicity of the training and not the length of the training required.</p> <p>2. A secondary concern of EOP-005-2 is requirement R4. In the last draft, draft 4, the team added the words “or prior to implementing a planned System modification” in regards to when a Transmission Operator’s restoration plan needs to be updated. While the change may have good intentions, upon further reflection it causes confusion and concern. The phrase “prior to” causes confusion in regards to the sub-requirement R4.1 that states the TOP submits its revised restoration</p>

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				<p>plan to its RC for approval “within the same 90 day period”. However, the 90 day period seems only to be associated with a time period after identifying an unplanned change that triggers a need to revise the restoration plan. Requirement R4 should be more clearly written for what is required for a planned change. Is it expected that the RC will review and approve a TOP’s revised restoration plan based on a planned change prior to the new restoration plan being implemented and effective? We suggest that R4 be split into two requirements covering both planned and unplanned changes to increase clarity of the standard.</p>
<p>Response: EOP-005-2, R11: As provided in previous responses, the SDT anticipates that unique tasks are those not performed in routine operation, such as resynchronizing subsections of the Transmission Operators system or with a neighboring system. As an official response to an industry comment, this response is part of the permanent record regarding this standard.</p> <p>2 hours of training: The SDT recognized very early that it would be difficult to describe a complete training program in the system restoration Reliability Standards. The current personnel training standards apply to operating personnel typically located in a control room. EOP-005-2, Requirement R10 describes the subject materials to be included in the Transmission Operator’s operations training program and permits the Transmission Operator to use a Systematic Approach to Training for that portion of the training requirements in EOP-005-2.</p> <p>EOP-005-2, R4: Only one “90 day period” is mentioned in the main requirement, so the sub-requirement refers to unplanned changes. Once there is an approved plan, there is always an approved plan, though it may not be the latest version of the Transmission Operator’s plan. EOP-005-2, Requirement R7 provides for additional flexibility.</p>				
Warren Schaefer	Dairyland Power Coop.	5	Affirmative	<p>If the current modifications to these standards are approved, I would expect that there will be requests for interpretation of several requirements of EOP-005-2 regarding the training requirements of R11 and R17. In R17, for example, each GO with a Blackstart resource must provide training "...to each of its operating personnel responsible for the startup of its Blackstart Resource...". Contrast that with the language of R11: Each TOP, TO, and DP "...shall provide a minimum of two hours of System restoration training every two years to their field switching personnel identified as performing unique tasks associated with the Transmission Operator’s restoration plan that are outside of their normal tasks." Note that in this latter case, the requirement does not specify "each" member of the pool of field switching personnel. Is this intentional, allowing less than 100% coverage in the 2-year cycle? For example, if training is provided and available but only 95% of the pool actually participates in the training, is that acceptable? Additionally, I would suggest that some definition or examples of "unique tasks" might be in order. There might be certain tasks that are more likely to be experienced during a blackout and subsequent restoration than under more typical operating</p>

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				circumstances, but does that make them "unique" in the context of the requirement, making 2 hours of training IN ADDITION TO routine training necessary?
<p>Response: The SDT does not see an inconsistency. The Generator Operator can determine which of its personnel are responsible for blackstart operations. Nothing prohibits the Generator Operator from including the blackstart training in its routine training program. Unique tasks are those not performed in routine operation, such as resynchronizing subsections of the Transmission Operator's system or with a neighboring system. As an official response to an industry comment, this response is part of the permanent record regarding this standard.</p>				
Tony Kroskey	Brazos Electric Power Cooperative, Inc.	1	Negative	In EOP-005 R11, it is not clear as to the meaning of "unique tasks" and whether such a task will require a minimum of two hours training will depend on what the task is. This needs to be fully addressed before going to a final ballot.
<p>Response: As provided in previous responses, the SDT anticipates that unique tasks are those not performed in routine operation, such as resynchronizing subsections of the Transmission Operators system or with a neighboring system. As an official response to an industry comment, this response is part of the permanent record regarding this standard.</p>				
Donald S. Watkins	Bonneville Power Administration	1	Affirmative	In general we think there are too many requirements making it cumbersome to focus. In EOP-005-2, suggest moving R9 testing requirements as a subelement under R13 (includes references to the testing requirements).
Rebecca Berdahl		3		R14 and R16 could also be combined (procedure with testing). Regarding the VSLs for EOP-005: VSL R6: Remove the OR with its following sentence from the SEVERE level.
Francis J. Halpin		5		VSL R11 & R17: The language regarding the % of personnel being trained for Lower, Moderate and High VSLs is confusing.
Brenda S. Anderson		6		VSL R15: Make correction for Moderate and High lower hour range (i.e. Moderate from 48 to 72 hours, High from 72 to 96 hours.)
<p>Response: EOP-005-2, R9: The SDT believes that consistency in testing requirements is required and therefore that the testing requirements should be common across the Transmission Operator's footprint and not specific to each agreement.</p> <p>EOP-005-2, R14 & R16: Having procedures is separate from testing those procedures, thus the separation.</p> <p>EOP-005-2, VSL R6: The SDT disagrees. All sub-requirements must be covered in the VSLs.</p>				

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<p>EOP-005-2, VSLs R11 & R17: The SDT believes they are consistent.</p> <p>EOP-005-2, VSL R15: The SDT believes that you may not be reading this correctly. The Lower VSL covers 24 – 48 hours. The Moderate covers 48 to 72. The High is for 72 to 96 and Severe is for greater than 96.</p>				
Mark Ringhausen	Old Dominion Electric Coop.	4	Negative	<p>My comments are on EOP-001-2 only: R1: We need to define what you mean by 'remote BAs'. How many and how far should one go to work with remote BAs? The SDT should be more specific in its expectations or change it to adjacent BAs.</p> <p>R5: Change 'neighboring' to 'adjacent' to provide clarity of expectations. R6: What does 'as appropriate' mean in this requirement? Can the SDT team define what they mean and provide more clarity to the entity and auditors? If not, then remove these words.</p>
<p>Response: The scope of this project only permitted the deletion of Requirement R2.4 pertaining to restoration plans. Any further revision is beyond scope and will require a separate SAR or the advancement of Project 2009-03 which is to deal with the revision of EOP-001.</p>				
Harvie D. Beavers	Colmac Clarion/Piney Creek LP	5	Affirmative	<p>Non-blackstart generation should be included in some type of training to expose them to 'sequence' and expectations of desired 'restart' capability. Communication requirements between all generation sources and local area load control needs to be better defined, and if 'drills' or training is to be functional, it should be all inclusive.</p>
<p>Response: The SDT believes that Requirement R10.1 of EOP-006-2 addresses this concern. Generator Operators identified in the plan are included regardless of whether they have Blackstart Resources.</p>				
Tom Bowe	PJM Interconnection, L.L.C.	2	Negative	<p>PJM is voting NO for the following reasons; We do not believe limiting the applicability is appropriate; this would allow those entities not identified to not meet the training requirement, even if they were a part of the restoration plan; this is not conducive to maintaining the reliability of the BES. By changing the applicability to include ALL entities included in the restoration plan, we ensure that ALL appropriate parties are included in the training.</p> <p>As for the training requirement itself, we agree that the training is necessary, as directed by FERC in Order 693, and the location of the requirement in the standards is minor. Our main issue is with the specification of a time requirement of two hours. The latest draft of the PER Standard, and FERC, have directed the need for a Systematic Approach to Training methodology, which is counter to the</p>

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				<p>imposition of an arbitrary time requirement. The SAT methodology is based on a 'train to standard, not to time ' philosophy. The SDT should ensure that what they are proposing is in line with the mandated methodology.</p> <p>The requirement to simulate the entire restoration plan is overly burdensome. When the blackstart capability plan was dropped from this requirement and replaced with the restoration plan, the amount of simulation required substantially increases. Adding some words to the requirement to limit the simulations to blackstart unit start-up and next unit cranking would eliminate this concern.</p>
Ray Mammarella	PP&L, Inc.	1	Negative	PPL supports PJM's comments.
Mark A. Heimbach	PPL Generation LLC	5		
Kenneth D. Brown	Public Service Electric and Gas Co.	1	Negative	The PSEG Companies participate in the blackstart plan of Transmission Operator PJM, and concur with PJM's comments.
Jeffrey Mueller		3		
Thomas Piascik		5		
James D. Hebson		6		
<p>Response: Applicability: The SDT believes that all necessary applicable entities have been identified. The balloters have not identified any additional entities. Responsible entities must be identified in the standards and they cannot be identified by the Transmission Operator.</p> <p>Training: The SDT recognized very early that it would be difficult to describe a complete training program in the system restoration Reliability Standards. The current personnel training standards apply to operating personnel typically located in a control room. EOP-005-2, Requirement R10 describes the subject materials to be included in the Transmission Operators operations training program and permits the Transmission Operator to use a Systematic Approach to Training for that portion of the training requirements in EOP-005-2.</p>				

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<p>Simulation: The SDT believes the commenter has over-estimated the amount of simulation required. Once the simulation steps have become routine, i.e., line energization and Load restoration with nearly automatic generation redispatch to account for the very small frequency changes, there is no need to continue simulation. The standard does not require a simulation to complete System and Load restoration. EOP-005-2, Requirement R1 defines the scope of the standard.</p>				
Ted E. Hobson	JEA	1	Negative	<p>R1: Each Transmission Operator shall have a restoration plan approved by its Reliability Coordinator ... This requirement causes entities to be dependent on the actions of another entity in order to be compliant (timely response by Reliability Coordinator in approving plans).</p> <p>R11: Each Transmission Operator, each applicable Transmission Owner, and each applicable Distribution Provider shall provide a minimum of two hours of System restoration training every ... This requirement is overly burdensome as many personnel perform field switching, and these personnel may change frequently. Identifying, "au priori" who might actually do field switching during a restoration event is difficult. The requirement should be for the certified operator to have this training included in their PER requirements, and they will appropriately direct the field personnel in emergency switching.</p>
Garry Baker	JEA	3	Negative	<p>R1: Each Transmission Operator shall have a restoration plan approved by its Reliability Coordinator... This requirement causes entities to be dependent on the actions of another entity in order to be compliant (timely response by Reliability Coordinator in approving plans).</p> <p>R11: Each Transmission Operator, each applicable Transmission Owner, and each applicable Distribution Provider shall provide a minimum of two hours of System restoration ... This requirement is overly burdensome as many personnel perform field switching, and these personnel may change frequently. Identifying, "au priori" who might actually do field switching during a restoration event is difficult. The requirement should be for the certified operator to have this training included in their PER requirements, and they will appropriately direct the field personnel in emergency switching</p>
Donald Gilbert	JEA	5	Negative	<p>The R1 requirement makes the affected entity very much dependent on the actions of another entity in order to be compliant (timely response by Reliability Coordinator in approving plans).</p> <p>The R11 requirement is overly burdensome in the mandate that every potential</p>

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				<p>employee that may be involved in field switching during a restoration event shall have appropriate training. It is not prudent to narrow the employee base for such switching support and thus every employee would need to be validated with the training. It is much more practical and prudent to assure that the certified operator instructing and directing the field personnel during emergency restoration efforts has the appropriate training included in their PER requirements.</p>
<p>Response: EOP-005-2, R1: The SDT recognizes this is a start-up problem and that there are many interacting requirements between EOP-005-2 and EOP-006-2. The Reliability Coordinators and Transmission Operators will have to coordinate during that time period. However, once you go through the implementation process, you will always have an approved plan. Please note that Reliability Coordinators and Transmission Operators are already required to have a restoration plan.</p> <p>EOP-005-2, R11: As provided in previous responses, the SDT anticipates that those trained can be limited to those performing unique tasks not performed in routine operation, such as resynchronizing subsections of the Transmission Operators system or with a neighboring system. The requirement only mandates those employees expected to be performing these unique tasks need be trained under this standard and therefore the SDT does not feel that this is an overly burdensome requirement. One can always do more than the standard.</p>				
Charles H Yeung	Southwest Power Pool	2	Negative	<p>SPP disagrees with the EOP-005-2 R1 requirements. As an RC, it is unclear what the standard requires the RC to verify in the TO's restoration plans. The measures place the burden on the TO to have their plans approved by their respective RC, but the TO has better information about what they need to restore their local systems.</p> <p>The R1 subrequirement 1.6 is unclear who sets the voltage and frequency limits and subrequirements 1.7 thru 1.9 are not clear whether "Operating Processes" are the TO's, the RC's or both. If the RC has a role in approval of TO Restoration Plans, it must be clearly defined and focused on the interconnectivity aspects between TOs and not on the local system.</p>
<p>Response: EOP-005-2, R1: EOP-005-2 does not apply to Reliability Coordinators. EOP-006-2 applies to Reliability Coordinators and Requirement R5 describes what the Reliability Coordinator must consider to evaluate the Transmission Operator's restoration plan. The SDT has drafted EOP-005-2 to cover activities of the Transmission Operator to restore its portion of the System following a Disturbance in which one or more areas of the Bulk Electric System (BES) shuts down and the use of Blackstart Resources is required to restore the shut down area to service. This is to be done in coordination with the Reliability Coordinator and in such a way as to assist the Reliability Coordinator in restoring its Reliability Coordinator area and its connections to other Reliability Coordinator areas.</p> <p>EOP-005-2, R1.6: All of Requirement R1 and its sub-requirements apply to the Transmission Operator. Requirement R13 assures that the Transmission Operator coordinates with the Generator Operators when setting voltage and frequency limits.</p>				

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Voter	Entity	Segment	Vote	Comment
Terry L. Blackwell	Santee Cooper	1	Negative	The RC should not be tasked with approving a TOP's Restoration Plan. A TOP's Restoration Plan should be coordinated with the RC and the RC should have input to a TOP's Restoration Plan.
Zack Dusenbury		3		
Suzanne Ritter		6		
<p>Response: In Order 693, the Commission proposal is that the Reliability Coordinators must be involved in the development and approval of the restoration plans. The SDT feels that the approval of the plans is consistent with the role of the Reliability Coordinator as defined in the Functional Model and does not add additional liability to the Reliability Coordinator.</p>				
John Bussman	Associated Electric Cooperative, Inc.	1	Negative	The RC should not be the APPROVING Authority of the EOPs.
<p>Response: In Order 693, the Commission proposal is that the Reliability Coordinators must be involved in the development and approval of the restoration plans. The SDT feels that the approval of the plans is consistent with the role of the Reliability Coordinator as defined in the Functional Model and does not add additional liability to the Reliability Coordinator.</p>				
Henry Ernst-Jr	Duke Energy Carolina	3	Negative	The role of the Reliability Coordinator (RC) has historically been to “coordinate” actions within its footprint and to aid in the “communication” outside of its footprint. The RC has NOT been involved in the intimate details of system restoration operations for which the local operating entities are the subject matter experts. This draft of EOP-006-2 continues in the effort to place additional responsibility and accountability on the RC. For example Requirement R1.9 in this draft calls for the RC to transfer operations and authority back to the Balancing Authority (BA). The implication is that authority and operations has previously been transferred to the RC from the BA. It is not clear that this transfer is supported (even allowed) by other standards. The responsibility for operations does not belong with the RC. Furthermore, the current drafts of EOP-006-2 Requirement R5.1 and EOP-005-2 Requirement R1 place responsibility on the RC to “approve” its transmission operators’ plans. Yet it provides no instruction or criteria (other than listing minimum content requirements) as to how to objectively assess the plans’ qualifications for approval. Additionally, this will likely create legal and compliance liability for the RC entity should the restoration not occur as expected.

Consideration of Comments on Initial Ballot of System Restoration and Blackstart Standards (Project 2006-03)

Voter	Entity	Segment	Vote	Comment
<p>Response: In Order 693, the Commission proposal is that the Reliability Coordinators must be involved in the development and approval of the restoration plans. The SDT feels that the approval of the plans is consistent with the role of the Reliability Coordinator as defined in the Functional Model and does not add additional liability to the Reliability Coordinator.</p>				
Thomas J. Bradish	Reliant Energy Services	5	Negative	The SDT is commended for a job well done on a very important reliability standard. Reliant voted "Negative" because we feel it could be improved upon in the following way. EOP-005 contains Requirement 9 that requires each TOP to have a black start resource testing procedure. R9 of the standard contains 3 sub-requirements that describe what must be included in the black start testing procedure. One of these is R 9.3 which mandates that each procedure must specify the minimum duration of the test. Isn't this a fill in the blank requirement that the SDT was instructed to eliminate? It is suggested that sub-teams be formed to develop the testing procedures for each type of black start unit so that we have continent wide testing procedures.
Trent Carlson		6		
<p>Response: The SDT believes the process described in EOP-005-2 provides a common framework for testing across the Transmission Operator's footprint. This gives the flexibility to the Transmission Operators to meet their restoration plan requirements. The Transmission Operator has incentives to make its testing requirements only as stringent as needed to meet the needs of its restoration plan or it risks having no Blackstart Resources.</p>				
Horace Stephen Williamson	Southern Company Services, Inc.	1	Negative	The Standards Drafting Team has not modified the standards as recommended by industry comments, particularly with regard to: 1. the level of detail included in the standards 2. the use of coordination and review among all operating entities rather than approval authority by the RC.
Robin Hurst	Alabama Power Company	3		
Leslie Sibert	Georgia Power Company	3		
Gwen S Frazier	Gulf Power Company	3		
Don Horsley	Mississippi Power	3		
William D Shultz	Southern Company	5		

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Voter	Entity	Segment	Vote	Comment
	Generation			
<p>Response: The SDT feels that it has responded appropriately to all industry comments throughout four different postings by either changing the standards as suggested or responding with a legitimate reason as to why the suggested changes were not made.</p>				
Danny Dees	MEAG Power	1	Negative	These proposed changes will increase our costs, which we will flow-through to our customers, and we are unable to identify commensurate customer benefits. Catastrophic system failures are extremely rare to begin with and the prospect that approving these changes may produce a marginal reduction in our average customer's restoration time is not compelling. We cannot even assure our customers that these changes will not increase their average restoration time (e.g., adjacent transmission operators, which have adequately prepared to resynchronize islands, may now have to wait for at least one RC's consent before they can proceed and responsible entities may delay their restoration of customers while they document their compliance with these requirements).
<p>Response: The SDT recognizes that there may be some increased costs to meet the more carefully worded requirements and to meet the set of comments included in the SAR and FERC Order 693, but does not see those costs as prohibitive or unreasonable in promoting reliability. The standards do not require the real-time approval of the Reliability Coordinator for any step, but expects the Reliability Coordinators and the Transmission Operators in its area to develop reasonable coordination processes or procedures.</p>				
Sammy Roberts	Progress Energy Carolinas	1	Negative	With respect to System Restoration Coordination, R1 of EOP-006 does not cover all scenarios for dependent restoration such as occurred with the Feb 2008 Florida Blackout where multiple TOPs were involved. This scenario could unfold in a large RC area such as MISO or PJM for which RC involvement in the coordination of restoration would be even more important.
<p>Response: The standards do not require the real-time approval of the Reliability Coordinator for any step, but expects the Reliability Coordinators and the Transmission Operators in its area to develop reasonable coordination processes or procedures.</p>				
Gregory L. Pieper	Xcel Energy, Inc.	1	Negative	Xcel Energy is voting negative for two primary reasons: 1) It could be interpreted that the data retention requirements for new Requirements will be retro-active. For example, R15 of EOP-005-2 is a new requirement. However, per the data retention requirement, the Generator Operator is required to have evidence that it notified its Transmission Operator of any changes in Blackstart Resource capability within 24 hours for "the last three calendar years". Please clarify in the standard that data retention periods do not apply to events prior to the effective date. 2) We do not feel that the drafting team adequately addressed the ambiguous use of the phrase "unique tasks" in Requirement 11 of EOP-005-2. We are concerned
Michael Ibold		3		
David F. Lemmons		6		
Liam		Northern States		

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Noailles	Power Co.			that the scope of what is considered a “unique task” could be interpreted to include items beyond what we believe unique tasks to be. This could lead to inconsistencies among registered entities, as well as the regional entities’ audit staff.
<p>Response: (1) Standards cannot require compliance before their effective dates. Applicable entities will begin their collection of data upon the effective date.</p> <p>(2) As provided in previous responses, the SDT anticipates that unique tasks are those not performed in routine operation, such as resynchronizing subsections of the Transmission Operators system or with a neighboring system. As an official response to an industry comment, this response is part of the permanent record regarding this standard.</p>				