

Consideration of Comments on Initial Ballot — Project 2006-04 — Backup Facilities

Date of Initial Ballot: June 23, 2010 – July 6, 2010

Summary Consideration: An initial ballot was conducted from June 23-July 6, 2010 and achieved a quorum of 89.05% and a weighted segment approval of 79.45%.

The SDT has reviewed and replied to all of the comments received with both affirmative and negative ballots. Several semantic changes will be made as shown below but no significant contextual changes were required. There were no changes to the standard necessary due to those few minority opinions that were received. The SDT believes that the standard is ready for the recirculation ballot.

R8. Each Reliability Coordinator, Balancing Authority, and Transmission Operator that has experienced a loss of its primary or backup functionality and that anticipates that the loss of primary or backup functionality will last for more than six calendar months shall provide a plan to its Regional Entity within six calendar months of the date when the functionality is lost, showing how it will re-establish primary or backup functionality.

Data retention - Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall retain its dated, current, in force Operating Plan for backup functionality plus all issuances of the Operating Plan for backup functionality since its last compliance audit in accordance with Measurement M1.

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, Herbert Schrayshuen at 609-452-8060 or at herb.schrayshuen@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

Voter	Entity	Segment	Vote	Comment
Joseph S. Stonecipher	Beaches Energy Services	1	Negative	1.1.6 states "A list of all entities to notify when there is a change in operating location". This can be interpreted as needing to maintain a list of all entities and then requiring notification of all entities when a change of locations is necessary. I am sure that is not

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

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Walt Gill	Lake Worth Utilities	1	Negative	<p>what the Drafting Team intends. The bullet should clarify which entities to list and notify, e.g., (1) the RC, (2) all neighboring (i.e., bordering) BAs and TOPs (for an RC, neighboring RCs as well), and (3) all GOPs, TOPs, BAs, LSEs and DPs within the operating area of the Responsible Entity.</p> <p>5.1 states "An update and approval of the Operating Plan for backup functionality shall take place within sixty calendar days of any changes to any part of the Operating Plan described in Requirement R1." This can be interpreted as applying to any minor change, which is not the intent of the Drafting Team as reflected in their response to comments. I suggest "An update and approval of the Operating Plan for backup functionality shall take place within sixty calendar days of changes to the Operating Plan specifically described in Requirement R1. The bullets in R1 basically describe things that would constitute a significant change (e.g., 1.1.8 describes "roles", so, if a role changes, i.e., a job title change through a re-organization, that would be a significant change. A change of a specific person filling that role would not be).</p>
Brad Chase	Orlando Utilities Commission	1	Negative	<p>The Measures (and Data Retention) require "dated" material where such a requirement for "dated" material is not within the requirements themselves. Measures should not have "hidden" requirements within them. If "dated" is a requirement, then the requirement itself needs to include it, otherwise, remove the reference to "dated" in the Measures.</p> <p>Also, many of the Measures (for instance M5) simply repeat the requirements. Measures are supposed to be examples of evidence, not "shall have evidence", e.g., for M5 "such as version tracking of its Operating Plan or signature approval of its Operating Plan" would be more appropriate.</p>
Frank Gaffney	Florida Municipal Power Agency	4	Negative	<p>Data retention for M1 is ambiguous, are we to retain just the current version, or all of the superceded versions since the last compliance audit? In general, the data retention phrases could be much simpler by saying something like "retain evidence of compliance since last compliance audit" rather than repeat all the requirements again.</p>
David Schumann	Florida Municipal Power Agency	5	Negative	<p>The VRF for R3 and R4 under severe should be reworded since all that is being done is repeating the words of the requirement itself, meaning that any violation would be Severe. As currently stated: "The responsible entity does not 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) in accordance with Requirement R4" would apply to any violation of R3 and R4. Hence, as written, all violations of this requirement would be severe since the "Severe" language would make the language under "Lower", "Moderate" and "High" superfluous. I suggest: "two or more High VRFs" for Severe.</p>

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<p>Response: 1.1.6 – Your interpretation of the requirement is correct and is what the SDT intended. The list needs to be specific, not generic. In a time of crisis, an exact list of who to call is required. Operators will have enough to worry about without trying to figure out who to call. The SDT realizes that this is a burden but believes it is a small cost to pay up front if a catastrophe actually occurs. No change made.</p> <p>5.1 – The suggested wording change does not alter the intent of the SDT, provide any additional clarity, or change the responsibility of the functional entity. By placing the qualifier of those changes described in Requirement R1 in the last iteration, the SDT has constrained the updates to only those items spelled out in the requirement. The SDT believes that if it is important enough to be in the plan, then it is important enough to require updating the plan if the information changes. No change made.</p> <p>Dated – Placing the word ‘dated’ in a measure does not hide a requirement in the measure. It is good business practice to date any document. The latest guidelines from NERC Compliance clearly encourage the use of ‘dated’ in measures whenever a document is part of the evidence. No change made.</p> <p>Measures – The SDT believes that it has written the measures in a form that complies with the latest guidelines from NERC Compliance. No change made.</p> <p>Data retention – The SDT believes that the data retention for Measure M1 already stated what was indicated but agrees that the wording may be obscure. A semantic change has been made to provide additional clarity.</p> <p style="padding-left: 40px;">Data retention - Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall retain its dated, current, in force Operating Plan for backup functionality plus all issuances of the Operating Plan for backup functionality since its last compliance audit in accordance with Measurement M1.</p> <p>VRF – Response to comments on VRF contained in the VRF/VSL poll comments report.</p>				
Tim Hattaway	PowerSouth Energy Cooperative	5	Negative	Concerned with the requirement concerning updating the plan.
<p>Response: By placing the qualifier of those changes described in Requirement R1 in the last iteration, the SDT has constrained the updates to only those items spelled out in the requirement. No change made.</p>				
Scott Kinney	Avista Corp.	1	Affirmative	Avista is in favor of the revised standard but is concerned with what is meant by "the simulated loss of primary control center functionality" in R7.1. We think this term needs to be defined. If "simulated loss" means the complete shutdown of the primary control center then Avista is really concerned with the risk to reliability. The "simulated loss" is too big of a risk to perform the simulation. Avista feels "simulated loss" shouldn't be defined as complete shutdown of the primary control center but rather placed on standby so the System Operator at the primary center can still take control if necessary during the simulated event.
<p>Response: The SDT believes that ‘simulated’ means just that and not an actual shutdown. How an entity accomplishes that simulation (standby, parallel operation, etc.) is entirely up to them. No change made.</p>				

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Donald S. Watkins	Bonneville Power Administration	1	Negative	<p>BPA disagrees with the 2 week time limitation in R4 for control center planned outages, believe it should be 3 to 4 weeks.</p> <p>BPA disagrees with the changes made to Requirement 5.1 and Measure 5.... changing "in capabilities" to "any part of the Operating Plan". It would not make sense to have to approve the plan for a simple telephone circuit re-routing transparent to the plan capability. Suggest modifying the language to state: "An update and approval of the Operating Plan for backup functionality shall take place within sixty calendar days of any changes in capabilities to any part of the Operating Plan such as a different primary or backup facility described in Requirement R1."</p> <p>General Comment - The High VSL for Requirement 4 will not apply to anyone because it contains an "And" criteria for a High VRF, and none of the requirements have a High VRF.</p>
Rebecca Berdahl	Bonneville Power Administration	3	Negative	
Francis J. Halpin	Bonneville Power Administration	5	Negative	
Brenda S. Anderson	Bonneville Power Administration	6	Negative	
<p>Response: R4 – The SDT has vetted the 2 week time period with the industry through multiple comment periods. Without specific reasoning to support a change to a longer period the SDT cannot justify a change at this point in the process. No change made.</p> <p>5.1 – The suggested wording change does not alter the intent of the SDT, provide any additional clarity, or change the responsibility of the functional entity. By placing the qualifier of those changes described in Requirement R1 in the last iteration, the SDT has constrained the updates to only those items spelled out in the requirement. The SDT believes that if it is important enough to be in the plan, then it is important enough to require updating the plan if the information changes. No change made.</p> <p>VSL - Response to comments on VSL contained in the VRF/VSL poll comments report.</p>				
Paul Shipp	Lakeland Electric	6	Negative	Clarification of entities to notify
<p>Response: The list needs to be specific. In a time of crisis, an exact list of who to call is required. Operators will have enough to worry about without trying to figure out who to call. The SDT realizes that this is a burden but believes it is a small cost to pay up front if a catastrophe actually occurs. No change made.</p>				
James R. Keller	Wisconsin Electric Power Marketing	3	Affirmative	<p>Comment 1: The May 5, 2010 draft of this standard appears to have errors in numbering in R1.2 (the series that follows is 1.1.1, 1.1.2, ..., 1.1.5). The error is carried through to R1.6 where the series that follows is 1.1.6, 1.1.7, and 1.1.8.</p>
Anthony Jankowski	Wisconsin Energy Corp.	4	Affirmative	<p>Comment 2: R1.1.1 (sic) Situational awareness is not a NERC defined term and therefore is subject to interpretation. Suggest the SDT add this term to the glossary of</p>

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Linda Horn	Wisconsin Electric Power Co.	5	Affirmative	<p>NERC terms, using a definition such as: Situational Awareness: Knowing what is going on in the system you control, and having sufficient information to understand what needs to be done to maintain or return to a reliable operating state.</p> <p>Comments 3: The VSLs for R1 are based on the number of missing Parts in R1.1 through R1.6. It is not clear whether Parts with multiple items listed (i.e. 1.2 and 1.6) are potentially additive in terms of the number of missing parts. If this is not the case, it may be a simple matter to state that there is a maximum number of 6 parts to miss.</p>
<p>Response: 1. The SDT agrees that the 'numbering' was in error, and this has been corrected. 2. The concept of situational awareness has been widely used in the electric industry since 2005 where it was used in the blackout reports prepared by NERC and the U.S.-Canada Power System Outage Task Force. In the context of the blackout report, as in standard EOP-008, it means knowing what is going on in the system you control, and having sufficient information to understand what needs to be done to maintain or return to a reliable operating state. Therefore, for each entity, the specific methods and information that would be needed to maintain situational awareness may be different. No change made.</p> <p>3. (Note - This comment should have been submitted as part of the VRF/VSL poll.) The team added the word, 'six' as proposed for clarity. If an entity misses a 'part' of 1.2, then this would count as missing one 'part.'</p>				
Martin Bauer P.E.	U.S. Bureau of Reclamation	5	Abstain	<p>While Reclamation chooses to abstain in this vote, we do note that the formatting in this standard will make it difficult to enforce. Specifically the sub requirements section numbers do not conform the numbering convention system used on other standards. Section 1.2 sub requirements are listed as 1.1.x, which implies a requirement 1.1 sub-requirement. Section 1.6 sub requirements are listed as 1.1.6 which appears to be a continuation of the sub-requirement numbering system used under requirement 1.2. Requirement 5 and 7 appear to have the correct sub-requirement numbering convention.</p>
<p>Response: The SDT agrees that the 'numbering' was in error and has been corrected.</p>				
Russell A Noble	Cowlitz County PUD	3	Negative	<p>Cowlitz PUD respectfully disagrees that the use of annual or annually is acceptable. These terms if strictly interpreted as every 365 days will cause "compliance creep," making it difficult to maintain a required activity at a particular time frame (e.g. September) within a calendar year.</p>
<p>Response: 'Annual' is used throughout the Reliability Standards. The common definition of annual from Webster's is: "occurring or happening every year or once a year." The SDT believes that this definition fits the requirement. No change made.</p>				
Michael F Gildea	Dominion Resources Services	3	Negative	<p>Dominion feels compelled to vote negative because the term "any" remains used in requirement R5.1 despite concerns expressed by some stakeholders during this process. The SDT, in response to those comments, stated "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 was made. In all due deference to the SDT, we</p>
John K Loftis	Dominion Virginia Power	1	Negative	

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Mike Garton	Dominion Resources, Inc.	5	Negative	cannot vote in support of the use of a term that is defined as "one, some, or all indiscriminately of whatever quantity: a : one or more -used to indicate an undetermined number or amount have you any money b : all used to indicate a maximum or whole needs any help he can get c : a or some without reference to quantity or extent grateful for any favor at all" when the intent of the SDT is to limit this requirement to changes only to "specific information required in R1". There is no guarantee that an auditor or anyone else those who reads this requirement without the background information will come to a same conclusion as the SDT. This places undue risk on those entities an entity with an Operating Plan that contains elements other than beyond those listed in R1. Another alternative would be for that entity to develop two a separate plans - one containing only the minimum requirements subject to compliance and another containing the additional elements. placing these additional elements in this separate plan. We don't believe this best serves reliability and are disappointed that the SDT didn't take this opportunity to clarify language when it was obvious that there was not a universal understanding of the intent of the requirement as written.. Dominion could support this standard if a simple change were made to R5.1 so that it reads "An update and approval of the Operating Plan for backup functionality shall take place within sixty calendar days of any changes to any part of the Operating Plan covering one of the minimum requirements listed under Requirement R1."
Louis S Slade	Dominion Resources, Inc.	6	Negative	
<p>Response: The suggested wording change does not alter the intent of the SDT, provide any additional clarity, or change the responsibility of the functional entity. By placing the qualifier of those changes described in Requirement R1 in the last iteration, the SDT has constrained the updates to only those items spelled out in the requirement. The SDT believes that if it is important enough to be in the plan, then it is important enough to require updating the plan if the information changes. No change made.</p>				
Douglas E. Hils	Duke Energy Carolina	1	Affirmative	<p>Duke Energy appreciates the work of the SDT on this. With our affirmative vote we have the following suggested corrections:</p> <ul style="list-style-type: none"> - in the Applicability section, 4.1.1 and 4.1.3 are not indented the same as 4.1.2; - the numbering of sub-bullets under R1.2 is incorrect, and should be 1.2.1, 1.2.2, etc. - Likewise, numbering of sub-bullets under R1.6 should be 1.6.1, 1.6.2, etc. <p>Thank you.</p>
<p>Response: 4.1.1 – The SDT agrees and the appropriate correction has been made. 1.2 – The SDT agrees that the 'numbering' was in error and this has been corrected. 1.6 – The SDT agrees that the 'numbering' was in error and this has been corrected.</p>				

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Stanley M Jaskot	Entergy Corporation	5	Negative	Entergy will be voting against this standard because we do not propose the 2-hour staffing requirement.
Terri F Benoit	Entergy Services, Inc.	6	Negative	The proposed minimum staffing time to fully activate and staff our Back-up Control Center is three (3) hours.
<p>Response: The SDT has vetted the 2 hour time period with the industry through multiple comment periods. If the 2 hour time frame can't be met with the existing plan, the SDT has proposed a 24 month implementation plan to allow entities to achieve compliance with the new standard. No change made.</p>				
Robert Martinko	FirstEnergy Energy Delivery	1	Affirmative	<p>FirstEnergy supports standard EOP-008-1 and is casting an Affirmative vote with the following suggestion with respect to Requirement R8 which states "Each Reliability Coordinator, Balancing Authority, and Transmission Operator that has experienced a loss of its primary or backup capability functionality and that anticipates that the loss of primary or backup capability functionality will last for more than six calendar months shall provide a plan to its Regional Entity within six calendar months of the date when the functionality is lost, showing how it will re-establish backup capability functionality.": Regarding the phrase "how it will re-establish backup capability functionality" at the end of the requirement, we suggest it be changed to "how it will re-establish primary or backup capability functionality" which would be consistent with the rest of the requirement.</p>
Douglas Hohlbaugh	Ohio Edison Company	4	Affirmative	
Mark S Travaglianti	FirstEnergy Solutions	6	Affirmative	
Kenneth Dresner	FirstEnergy Solutions	5	Affirmative	
<p>Response: The SDT agrees and has made the suggested semantic change.</p> <p>R8. Each Reliability Coordinator, Balancing Authority, and Transmission Operator that has experienced a loss of its primary or backup functionality and that anticipates that the loss of primary or backup functionality will last for more than six calendar months shall provide a plan to its Regional Entity within six calendar months of the date when the functionality is lost, showing how it will re-establish primary or backup functionality.</p>				
Kirit S. Shah	Ameren Services	1	Negative	<ul style="list-style-type: none"> o R1 is to have a PLAN which is "documentation". The VRF should be low. o R.5.1, SDT should ask the entity to list the assumptions that support the 2 hours; otherwise it might become a violation/performance obligation if an actual emergency takes more than 2 hours. We believe that the plan should be reasonably likely to be effected in 2 hour transition but force majeure may pre-empt actual performance. o In R4, the second line, the "applicable certified operators" would be served to mirror the language in the PER standard NERC-certified operating personnel and we would add appropriate rather than applicable and add a parenthetical (e.g TOP functionality to be provided by a NERC TOP or RC certified operator). It would be illogical to say that since we are RC certified but we are doing TOP function, that we wouldn't be

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				"applicable". Said another way, applicable or higher, conceptually should apply.
Ralph Frederick Meyer	Empire District Electric Co.	1	Negative	<p>R1 is to have a PLAN which is "documentation". The VRF should be low.</p> <p>R1.5.1, SDT should ask the entity to list the assumptions that support the 2 hours; otherwise it might become a violation/performance obligation if an actual emergency takes more than 2 hours. The plan should be reasonably likely to be effected in 2 hour transition but force majeure may pre-empt actual performance.</p> <p>In R4, the second line, the "applicable certified operators" would be served to mirror the language in the PER standard NERC-certified operating personnel and we would add appropriate rather than applicable and add a parenthetical (e.g TOP functionality to be provided by a NERC TOP or RC certified operator).</p>
<p>Response: VRF – Response to comments on VRF contained in the VRF/VSL poll comments report.</p> <p>5.1 – The SDT assumes that you meant Requirement R1, part 1.5, and not R5.1. The SDT believes that an entity should plan to transition in the 2 hour timeframe. No change made.</p> <p>R4 – The SDT believes that the term 'applicable' accomplishes exactly what you suggest in far fewer words. No change made.</p>				
Marjorie S. Parsons	Tennessee Valley Authority	6	Negative	<p>R1. 1.3 consistent ? identical</p> <p>R3. And R4. Implies that for a planned loss of primary or backup functionality lasting longer than two weeks, a tertiary facility is required. This seems to be in conflict and much more restrictive than requirement R8. which states that for real losses anticipated to last longer than 6 months the RC, BA or TO has 6 months from the time of the loss to provide a plan to its Regional Entity.</p>
George T. Ballew	Tennessee Valley Authority	5	Negative	<p>R5. "any changes" is a very broad requirement open to interpretation by an auditor. This is a potential violation waiting to happen. Need to use plain language that is more clear and concise in these standards.</p> <p>R7. How do you document backup functionality? By testing every possible function? If then intent is to conduct operations for two hours from the backup facility and document , then say just that. Test the plan annually, how often do we test the functionality of the backup facilities?</p>
<p>Response: 1.3 – The SDT assumes that you meant to replace the word 'consistent' with 'identical'. The SDT believes that there are some functions in a primary control center that do not have to be duplicated at a backup facility in order to maintain compliance with the Reliability Standards and therefore, the use of the term 'identical' is not appropriate. No change made.</p> <p>R3/4 – The SDT does not see any conflict between Requirements R3 & R4 and Requirement R8. Planned outages indicate a degree of control where you can determine the length of the outage and plan accordingly. The 2 week time period is a reasonable limit for most situations that the SDT could come up with. With an unplanned outage, you have no (or little) control over the initiation or length of the outage. The SDT felt that it would be unreasonable to place a hard and fast time limit on unplanned outages as any time limit could eventually lead to requiring a tertiary system. Therefore, no time limit was</p>				

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<p>placed in Requirements R3 & R4 and a six month time limit for a plan was established in Requirement R8 following a catastrophic situation. No change made.</p> <p>R5 – By placing the qualifier of those changes described in Requirement R1 in the last iteration, the SDT has constrained the updates to only those items spelled out in the requirement. The SDT believes that if it is important enough to be in the plan, then it is important enough to require updating the plan if the information changes. No change made.</p> <p>R7 – Requirement R7 does not mandate that an entity document backup functionality but rather that an entity document the results of the backup test. The requirement clearly states that the test must be done on an annual basis. No change made.</p>				
Thomas C. Mielnik	MidAmerican Energy Co.	3	Negative	The R5.1 sixty day requirement threshold for "any" change subjects an entity to a high VSL for administrative issues that don't impact the Bulk Electric System. This is inappropriate and unnecessarily if the plan lists relevant information that is useful, and specific but might not affect the plan or Bulk Electric System reliability.
Terry Harbour	MidAmerican Energy Co.	1	Negative	R5.1 should be deleted in its entirety. If not deleted, R5.1 should be clarified to drop "any" and include only "changes that affect BES functionality".
<p>Response: VSL – Response to comments on VSL contained in the VRF/VSL poll comments report.</p> <p>5.1 – The suggested wording change does not alter the intent of the SDT, provide any additional clarity, or change the responsibility of the functional entity. By placing the qualifier of those changes described in Requirement R1 in the last iteration, the SDT has constrained the updates to only those items spelled out in the requirement. The SDT believes that if it is important enough to be in the plan, then it is important enough to require updating the plan if the information changes. No change made.</p>				
John Bussman	Associated Electric Cooperative, Inc.	1	Negative	The standard is still very vague as to whether data centers that supply information to primary and backup control facilities have to be redundant. The requirement should be clear.
<p>Response: The SDT believes that they have made the requirement as clear as possible within the scope and purpose of the standard. Specific configurations of monitoring and control systems are beyond the scope of the SDT. No change made.</p>				
Michael Ibold	Xcel Energy, Inc.	3	Negative	The term 'situational awareness' introduces an ambiguous term that can be widely interpreted (especially between auditor and entity) and result in a gap of the desired goal. If the intent is to simply indicate that compliance with the NERC standards is intended, then state as such. This could also be accomplished through the use of language similar to that used in R4 "...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."
Liam Noailles	Xcel Energy, Inc.	5	Negative	
David F. Lemmons	Xcel Energy, Inc.	6	Negative	
<p>Response: The concept of situational awareness has been widely used in the electric industry since 2005 where it was used in the blackout reports</p>				

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prepared by NERC and the U.S.-Canada Power System Outage Task Force. Therefore, for each entity, the specific methods and information that would be needed to maintain situational awareness may be different. No change made.				
Terry Volkmann	Volkmann Consulting, Inc.	8	Negative	This standard does not consider the impact to the BES in requiring a BU CC. The Version 4 of the CIP standards, presently in development, considers size when determining applicability of most of the CIP requirements. For most of the CIP requirements to be applicable, an entity needs to operate higher than 100kv (East) or be larger than 1000 MW.s It seems appropriate for a similar requirements to be in place for requiring a BU CC.
Response: The SDT has allowed for contracted services for Transmission Operators and Balancing Authorities which should alleviate concerns over the size of an entity and the impact of the standard. No change made.				