

Fourth Draft of Standards for System Restoration and Blackstart (Project 2006-03)

Fourth draft of the standards for System Restoration and Blackstart (Project 2006-03). Comments must be submitted by **November 18, 2008**. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

Background Information:

The System Restoration and Blackstart Standard Drafting Team (SRB SDT) has responded to all comments submitted for the third draft. In addition to reviewing the most recent comments, the SRB SDT has carefully reviewed all prior comments and FERC Order 693. The SRB SDT did this complete review as part of our process to make the fourth draft as near final as possible. The SRB SDT recognizes that there are considerable changes from the currently effective standards, but that should be expected as NERC follows its initial Reliability Standards Development Work Plan to make the standards clear and enforceable.

During a review of preliminary drafts of EOP-005 and EOP-006, FERC staff observed that the standards didn't include a high level set of strategies or principles for restoring the interconnection. This would include things such as having certain blackstart capabilities, etc. The drafting team discussed this and agreed that the Reliability Coordinator should publish a set of strategies or principles and the Transmission Operators' restoration plans should support these strategies. The fourth drafts of EOP-005 and EOP-006 each include a new subrequirement R1.1 to address this issue - EOP-006-2 Requirement R1.1 requires the Reliability Coordinator to document these strategies, and EOP-005-2 Requirement R1.1 requires the Transmission Operator to document that its system restoration plan supports its Reliability Coordinator's system restoration strategies. One of the questions in this comment form asks for feedback on these additions.

The most recent drafts have additional requirements for the Reliability Coordinator. To assure we have no gaps in the translation of the current standards to a fully enforceable set, it is necessary to have the highest operational authority, the Reliability Coordinator, fill any gaps that would have been created.

Because of the significant changes from the currently approved standards and the considerable interactions between the requirements of EOP-005-2 and EOP-006-2, the SRB SDT is proposing a 24 month implementation period for all requirements.

The draft standards, EOP-005-2 and EOP-006-2, should be reviewed as a set when providing comments.

The System Restoration and Blackstart Drafting Team would like to receive industry comments on this group of standards.

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

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

1. The SDT has made a number of clarifying changes to the requirements of EOP-005-2 based on industry comments from the third posting. Do you agree with the changes that were made? If not, please provide specific suggestions for change.

Yes

No

Comments: In R1.7 and R1.8 The MRO does not agree with replacing the word Procedures with Processess. The word Procedures is an electric utility industry widely recognized term used to refer to operating and switching procedures. Please change Processes back to Procedures.

R15 states that the GOP with a Blackstart Resource shall notify its TOP of any known changes to the "capabilities" of the Blackstart Resource... Is the intent to know changes to outputs of MWs and MVARs or changes that would not allow the Blackstart Resource to start and energize a bus? Please clarify the intent. 24 hours seems restrictive and this should only apply to blackstart resources. TOP-002 R14 notifies the TOP of operating restraints and VAR-002 covers restrictive limits, is there the possibility of double jeopardy if these items are covered elsewhere?

In R1, The MRO believes that the statement "to a state whereby the choice of the next Load to be restored is not driven by the need to control frequency or voltage regardless of whether the Blackstart Resource is located within the Transmission Operator's System" is explanatory and not necessary, please remove.

In R1.4, The MRO would like to see "limitations" added to the list of characteristics.

In R9.1, The MRO would like the testing time frame to be increased from 3 years to 5 years to be consistent with the analysis requirement in R6. The MRO and WECC have gone to 5 years for other generator testing requirements.

In R14 & R17, The MRO realizes the SDT is referencing the Blackstart bus but the requirements are open to any bus. These requirements should be restated to clarify the energization of the blackstart bus. The violation severity level for R17 and the retention period wording for R14 both have vague wording as well perhaps they could be reworded.

2. The SDT has made a number of clarifying changes to the measures in EOP-005-2 based on industry comments from the third posting. Do you agree with the changes that were made? If not, please provide specific suggestions for change.

Yes

No

Comments: In M1, the last part of the measure states "as shown with the written approval letter from its Reliability Coordinator" the MRO would like to see this statement removed from the measure to be in line with R1. The requirement does not say that we need written approval, there are other forms of approval such as e-mail.

3. The SDT has made a number of clarifying changes to the compliance elements in EOP-005-2 based on industry comments from the third posting. Do you agree with the changes that were made? If not, please provide specific suggestions for change.

Yes

No

Comments: Retention periods, measures, & violation severity levels for R7 and R8 mention the word "System" but the requirements mention the Bulk Electric System (BES). This is not consistent. The measures, retention periods, & violation severity levels should be consistent with the requirements and reference the BES.

The MRO believes that the VSLs for R3 are not consistent with the requirement, please clarify.

For R17, the severe VSL does not specify which bus is to be energized. The MRO believes that this VSL compliance issue should be a percentage of total operators trained or a total amount of training time, but not ALL or NONE.

4. The SDT has made a number of clarifying changes to the requirements of EOP-006-2 based on industry comments from the third posting. Do you agree with the changes that were made? If not, please provide specific suggestions for change.

Yes

No

Comments: In R1.2 the MRO do not agree with replacing the word Procedures with Processess. The word Procedures is an electric utility industry widely recognized term used to refer to operating and switching procedures. Please change Processess back to Procedures.

MRO believes that a "minimum blackstart capability requirements" should not be set by the RC. If by "minimum blackstart capability" the SDT intention is for the RC to set the number, location, strategy of restoration, or other minimum standard, this should either be set by the RRO, TOP or by a NERC standard with basis.

5. The SDT has made a number of clarifying changes to the measures in EOP-006-2 based on industry comments from the third posting. Do you agree with the changes that were made? If not, please provide specific suggestions for change.

Yes

No

Comments:

6. The SDT has made a number of clarifying changes to the compliance elements in EOP-006-2 based on industry comments from the third posting. Do you agree with the changes that were made? If not, please provide specific suggestions for change.

Yes

No

Comments:

7. The SDT added a new subrequirement for the Reliability Coordinator's restoration plan to include a high level description of the Reliability Coordinator's strategies for restoring the interconnection - and an associated requirement for the Transmission Operator's restoration plan to document how it supports the Reliability Coordinator's restoration strategies. Do you agree with these additions? If no, please identify why not.

Yes

No

Comments:

8. The SDT has completely re-worked the Implementation Plan based on industry comments from the third posting. Do you agree with the changes that were made? If not, please provide specific suggestions for change.

Yes

No

Comments:

9. Do you believe that these standards provide for an adequate level of reliability and are ready for balloting?

Yes

No

Comments: Based on the comments provided above, the MRO would like to see our comments addressed before it is placed in ballot.