

Unofficial Comment Form for the Third Draft of EOP-008-1 — Loss of Control Center Functionality for the Backup Facilities SDT (Project 2006-04)

Please **DO NOT** use this form to submit comments. Please use the electronic comment form located at the link below to submit comments on the 3rd draft of the standards for Backup Facilities (Project 2006-04). Comments must be submitted by **April 15, 2009**. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-947-3673.

http://www.nerc.com/filez/standards/Backup_Facilities.html

Background Information:

The Backup Facilities Standard Drafting Team (BFSDT) has made changes to the third posting of EOP-008-1 — Loss of Control Center Functionality based on comments received from the industry. Major changes included:

- Section 4.1.2 — A revision to the applicability of the Transmission Operator. Now, applicability is to all Transmission Operators.
- Requirement R3 — This now applies to the Reliability Coordinator and Balancing Authority as well as the Transmission Operator.
- Requirements R4 and R5 — Clarifications have been made to the applicability of Reliability Standards, avoiding the need for tertiary functionality, and when backup functionality is not required.
- Requirement R7 — Clarification has been provided with regard to independence of facilities.

The Backup Facilities Standard Drafting Team would like to receive industry comments on this standard. Accordingly, we request that you submit your comments on this form by **April 15, 2009**.

1. The SDT has discovered that Compliance is already enforcing Requirement R3 as part of its review of delegation agreements. Therefore, it appears that this requirement could be deleted. Do you agree that this requirement can be deleted? If not, please provide specific reasons why it shouldn't be deleted.

Yes
 No

Comments: With this clarification, the SDT has removed redundancy from this updated Standard, thank you.

Please remove requirement 3 for the next posting of this standard.

2. The SDT has made a change in the applicability of the Transmission Operator (see Section 4.1.2) so that all Transmission Operators are treated equally. Do you agree with the change that was made? If not, please provide specific suggestions for improvement.

Yes
 No

Comments:

3. The SDT has provided clarifications to the applicability of reliability standards, avoiding the need for tertiary functionality, and when backup functionality is not required in Requirements R4 and R5. Do you agree with these changes? If not, please provide specific suggestions for improvement.

Yes
 No

Comments: With this clarification, the SDT has removed redundancy from this updated Standard, thank you.

The MRO NSRS suggests that in R4.2 and R5.2 the SDT include R9's time line of six months to submit a plan to the RE or RC. Then R9 can be deleted.

4. The SDT has clarified the issue of independence of facilities in Requirement R7. Do you agree with this change? If not, please make specific suggestions for improvement.

Yes
 No

Comments:

5. Do you believe this standard is ready for balloting? If not, please supply the specific reasons for your position.

Yes
 No

Comments:

R1, Requires the entity to "have a current Operating Plan". NERC defines Operating Plan as "A document that identifies a group of activities that may be used to achieve some goal. An Operating Plan may contain Operating Procedures and Operating Processes. A company-specific system restoration plan that includes an Operating Procedure for black-starting units, Operating Processes for communicating

restoration progress with other entities, etc., is an example of an Operating Plan". Contained in the defined term, NERC explains that an Operating Procedure and Operating Process are sub-components within the Operating Plan. R1.3 and R1.6 dictate the use of an Operating Process. R1.4 dictates the use of an Operating Procedure. This will lead to confusion within the industry. Recommend the SDT streamline these requires since they are sub-components of an Operating Plan.

R1, R4, R5 and R7, Request clarification, The Operating Plan described in R1 is to contain items for "backup functionality" and at a minimum contain the sub-requirements in R1.2. Then in R4 (and in R5 for the BA and TOP), the SDT requires the RC to "have a backup control center facility that provides the functionality required for maintaining compliance with ALL Reliability Standards that depend on primary control center functionality". The PURPOSE of this Standard is for continued reliability operations of the BES (also stated in R1, and R3). FERC Order 693 states in paragraph 672, under (3) "provide for a minimum functionality to replicate the critical reliability functions of the primary control center". Note: same paragraph (5) states: "includes a Requirement that all reliability coordinators have full backup control centers". Does this proposed Standard apply to the Reliability of the BES or all Standards assigned to a RC, TOP, and BA, please clarify.

R1.5, States that an entity has up to 2 hours to fully implement the backup functionality. Where did the two hour time frame come from and what is the justification for it? There are some examples in actual emergencies that indicates the backup control center should be a substantial distance from the primary, to prevent the possibility of losing both the primary and backup facilities to the emergency, which may make it impossible to have the backup up, running, and fully functional within 2 hours. Please note the hurricanes in New Orleans, floods in Iowa.

R5, The SDT is adding more components to the non-defined term of "backup functionality" as stated in the sub-requirements of R1.2. Added are the processes of "monitoring, control, logging, and alarming". If these are components of R1.2.1, then they should be added to R1.2.1, which will stream line the Standard.

R2, The MRO NSRS does not believe that it is nessesscary for an unmanned facility (like a repeater tower) that "supports" the backup facility to have a copy of the Operating Plan and suggests the requirement be modified to clarify.

R7 and R9, please clarify what backup "capability" is when the rest of the proposed standard references backup "functionality".

R9, Uses the term Reliability Assurer and is undefined as stated by NERCs Reliability Functional Model (V4) "While the specific role of the Reliability Assurer is not fully developed at the present time, the following are representative of the Tasks that might be performed:". The term Regional Entity or Reliability Coordinator should be used since they are defined and should be contained in R9. If at a later date Reliability Assurer is approved, NERC may submit an errata to update the Requirement.