

Unofficial Comment Form for 4th Draft of Standards for Backup Facilities (Project 2006-04)

Please **DO NOT** use this form. Please use the [_form](#) located at the link below to submit comments on the 4th draft of the standards for Backup Facilities (Project 2006-04). Comments must be submitted by **March 8, 2010**. If you have questions please contact Ed Dobrowolski at .dobrowolski@nerc.net or by telephone at 609-947-3673.

[://www.nerc.com/filez/standards/Backup_Facilities.html](http://www.nerc.com/filez/standards/Backup_Facilities.html)

Background Information:

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

- Requirement R1, part 1.1 — Clarification of the terminology “prolonged period of time” by replacing it with “the time it takes to restore the primary control center functionality”.
- Requirement R1, part 1.2.1 — Clarification of “situational awareness”.
- Requirements R3 and R4 — Clarifications have been made to staffing requirements of the backup facility/functionality.
- Requirement R6 — Clarification of the term “independent” by replacing it with “do not depend on each other”.
- Updates to the VSLs to conform to the latest VSL Guidelines.

The Backup Facilities Standard Drafting Team would like to receive industry comments on this standard. Accordingly, we request that you review the red line version of the standard, the VSL Guidelines, and the drafting team’s justification for proposing VSL and then submit your comments on the electronic form by **March 8, 2010**.

Unofficial Comment Form — Project 2007-04: Backup Facilities

1. Requirement R1, part 1.1: 'prolonged period of time' was replaced with 'the time it takes to restore the primary control center functionality'. Do you agree with this change? Please supply specific reasons for your comments.

Yes

No

Comments: The MRO supports the change the new verbiage provides clarity lacking in the previous revision.

2. Requirement R1, part 1.2.1: 'allow visualization capabilities' has been deleted thus placing the onus on situational awareness of the BES. Do you agree with this change? Please supply specific reasons for your comments.

Yes

No

Comments: The MRO agrees with the removal of the phrase "allows visualization of capabilities" but disagrees with the addition of the phrase "situational awareness of the BES." "Situational awareness of the BES" is neither a defined term nor is it a requirement for a primary control center. Using this term would result in the request for interpretations, inconsistent enforcement, or rule making through enforcement.

To address this issue the MRO suggest the verbiage of R1.2.1 be revised to state:

"1.2.1. Tools and applications that ensures reliable operations of the BES."

3. Requirements R3 & R4: 'when control has been transferred to the backup...' was added to emphasize that operators are only required at the backup when it is in service. Do you agree with this change? Please supply specific reasons for your comments.

Yes

No

Comments: The MRO supports the clarification described in R4. We suggest removing the phrase "of two weeks or less." The length of allowable outage regardless if it is planned or unplanned has the same effect on the BES and should be treated consistently in R8.

4. Requirement R6: 'can independently maintain' was replaced with 'do not depend on each other...' Do you agree with this change? Please supply specific reasons for your comments.

Yes

No

Comments: The phrase "do not depend on each other for" is no less ambiguous than "can independently maintain" therefore the MRO does not support this change. Furthermore, the required level of redundancy and separation can not be adequately defined until the scope (radius) of damage to the primary control center is defined and if other single failure (n-1) scenarios must be considered.

The MRO suggests that the N-1 scenario includes, and should be limited to, the primary control center and its energy management system. Other systems, communication systems and communication rooms outside of the rooms that house primary control center or primary energy management system would be assumed to be intact and fully operable.

Failure to first define the level of assumed damage will result in the request for interpretations, inconsistent enforcement, and rule making through enforcement.

5. The SDT has made changes to the VSLs for this project based on the latest VSL guidelines. Do you agree with these changes? If not, please provide specific reasons for your comment. Do you agree with these changes? Please supply specific reasons for your comments.

Yes

No

Comments: R1, R2, and R8 are documentation issues not a functionality issue. Therefore the maximum severity should be no more than moderate.

With regards to R5, this is a documentation issue related to the control centers. It is not a functionality issue. Therefore it is hard to conceive of a documentation issue that could have a significant adverse affect on the reliability of the BES. Furthermore the materiality of the omitted updated material must be included in any discussion of risk factors. For example, failure to include and updated phone number in the plan documented has little or no affect on the reliability and safety of the BES. Whereas, outdated instructions on how to establish data communication would have more significance.

Furthermore it is hard to conceive of a scenario of how an annual review, regardless of the definition of annual, overdue by one day could significantly affect the reliability of the BES especially if that annual review did not identify any changes. As R5 deals with documentation and not functionality, violations of R5 should be low.

With regards to R7, the failure to test or surveil a function should only be considered a high or severe issue if the lack of surveillance failed to assure or could have failed to assure an adequate response to a real event.

6. Do the proposed revisions to the standard pose any new issues or questions that haven't been raised and previously addressed? Please provide specific reasons for your comment.

Yes

No

Comments:

1. What is the significance of the two hours in R1.5?

2. Is it the intention to find the entity in violation if they can't get their back-up site fully functional within two hours for any reason?

3. We are concerned that the term "backup capabilities" has not been clearly defined or explained in the Standard. It is used in R6 and in R8. We feel that R6 should be changed to read: "Each RC, BA and TOP shall have primary and backup functionality, as defined in R4, that do not depend on each other." We recommend that R8 should replace the word capability with functionality.