

## Unofficial Comment Form for Project 2006-06 — Reliability Coordination

Please **DO NOT** use this form to submit comments. Please use the [electronic form](#) at the link below to submit comments on the proposed supplemental SAR to address specific directives from FERC Order 693 related to reliability standard IRO-003-2 — Reliability Coordination — Wide-Area View which have not been assigned to any other project. Comments must be submitted by **September 3, 2010**. If you have questions please contact Stephen Crutchfield by email at [Stephen.crutchfield@nerc.net](mailto:Stephen.crutchfield@nerc.net) or by telephone at 609-651-9455.

[http://www.nerc.com/filez/standards/Reliability\\_Coordination\\_Project\\_2006-6.html](http://www.nerc.com/filez/standards/Reliability_Coordination_Project_2006-6.html)

### **Background:**

The purpose of this SAR is to expand the scope of work for Project 2006-06 Reliability Coordination to address specific directives from FERC Order 693 related to reliability standard IRO-003-2 (Reliability Coordination — Wide-Area View) which have not been assigned to any other project. The directives in FERC Order 693 to be addressed by the standard drafting team for Project 2006-06 Reliability Coordination are detailed in the following paragraphs from the Order:

*Paragraph 909. The purpose of IRO-003-2 is for a reliability coordinator to have a wide-area view of its own and adjacent areas to maintain situational awareness. Wide-area view also facilitates a reliability coordinator's ability to calculate SOL and IROL as well as determine potential violations in its own area.*

*Paragraph 910. In the NOPR, the Commission proposed to approve the Reliability Standard as mandatory and enforceable. In addition, pursuant to section 215(d)(5) of the FPA and § 39.5(f) of our regulations, the Commission proposed to direct NERC to submit a modification that includes: (1) Measures and Levels of Non-Compliance and (2) criteria to define the term "critical facilities" in a reliability coordinator's area and its adjacent systems.*

### **i. Comments**

*Paragraph 911. APPA agrees that IRO-003-2 is sufficient for approval as a mandatory and enforceable Reliability Standard. However, APPA suggests that, instead of merely including criteria to define critical facilities as proposed, NERC and each Regional Entity should establish, document, use and make transparent the methodology, data and procedures they use to determine "critical facilities."*

*Paragraph 912. Entergy agrees with the need for the criteria, but cautions that it must be flexible enough to allow for changing conditions experienced in real-time operations. Xcel notes that the term "critical facilities" is not defined and suggests that the Reliability Standard not be approved until the term is defined.*

### **ii. Commission Determination**

*Paragraph 913. For the reasons stated in the NOPR the Commission approves proposed Reliability Standard IRO-003-2 as mandatory and enforceable. NERC's November 2006 revision to the Reliability Standard satisfies the proposal to include Measures and Levels of Non-Compliance.*

*Paragraph 914. Further, pursuant to section 215(d)(5) of the FPA and § 39.5(f) of our regulations, we adopt in the Final Rule the proposal to direct that the ERO*

*develop a modification to the Reliability Standard through the Reliability Standards development process to create criteria to define the term “critical facilities” in a reliability coordinator’s area and its adjacent systems. In developing the required modification, the ERO should consider the suggestions of APPA, Entergy and Xcel.*

The SC authorized posting the SAR to expand the scope of the project to address two directives from Order 693 related to IRO-003; authorized adding missing measures to IRO-003, and directed the RC SDT to solicit stakeholder feedback on what ‘critical facilities’ should be monitored in adjacent Reliability Coordinator Areas before drafting a requirement to address this directive.

1. The scope of this SAR is to address FERC directives from Order 693 associated with reliability standard IRO-003-2 — Reliability Coordination — Wide-Area View as follows:
  - Add measures for each requirement
  - Create criteria to define the term “critical facilities” in a reliability coordinator’s area and its adjacent systems and consider the suggestions of APPA, Entergy, and Xcel when doing so.

Do you agree with the proposed scope of the SAR? If not, please explain in the comment area.

Yes

No

Comments: As stated in the Reliability Standards Development Procedure, “Measures are used to assess performance and outcomes for the purpose of determining compliance with the requirements “. Measures should give a Responsible Entity what types of proof of compliance that can be used, not the only types of proof of compliance that an entity can have as compliance proof. Please take this into consideration when adding measures.

Do not agree with the suggestion of defining “critical asset”, per se at the NERC level. As noted and stated in FERC Order 693, paragraph 914, FERC directs a criteria to define “critical facilities” and the best way is to define a “methodology” for the responsible entity to follow in determining critical facilities. Recommend that any definition for critical facilities not be included in CIP-002 through CIP-009. The methodology would only be used within this project only. The use of the word “critical” is confusing recommend replacing the word with “important”, “vital”, “crucial” or “essential” facility.

2. In Paragraph 911 above, “APPA suggests that, instead of merely including criteria to define critical facilities as proposed, NERC and each Regional Entity should establish, document, use and make transparent the methodology, data and procedures they use to determine “critical facilities.”. Do you agree with the suggestion by APPA? If not, please explain in the comment area.

Yes

No

Comments: Do not agree with each Region establishing a methodology for defining what a “critical facility” is. There are too many MRRE’s (Multiple Region Registered Entities) that would have to comply with up to 8 different Regions. The SDT should address this issue on behalf of NERC only. Through the NERC delegation agreements, Regions are to

enforce NERC Standards through consistent enforcement, meaning each Region shall come to the same conclusion as the other, upon review of compliance evidence. If there are 8 different methodologies, this will never be achieved.

3. In Paragraph 912 above, “Entergy agrees with the need for the criteria, but cautions that it must be flexible enough to allow for changing conditions experienced in real-time operations.” Do you agree with the suggestion by Entergy? If not, please explain in the comment area.

Yes

No

Comments: System conditions should not play any part of what a “critical facility” is. Changing system conditions are related to section 215 of the Federal Power Act of 2005, where FERC defined the term “reliable operation” means operating the elements of the bulk-power system within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or cascading failures of such system will not occur as a result of a sudden disturbance, including a cybersecurity incident, or unanticipated failure of system elements.

FERC Order 693, paragraph 914 states in the last sentence that “the ERO should consider the suggestion of APPA, Entergy and Xcel”. The NSRS believes the best way is for NERC to publish a methodology requirement within this Standard.

4. In Paragraph 912 above, “Xcel notes that the term “critical facilities” is not defined” and suggests that a definition is necessary. Do you agree with the suggestion by Xcel? If not, please explain in the comment area.

Yes

No

Comments: Entities should be allowed to determine what facilities are deemed to be critical to their system. As stated by the NERC President, “everything cannot be a priority” and by casting a wide net, a definition of critical facility may bring too many items that are not truthfully, critical to the reliability of the BES. Recommend that the SDT provide a methodology.

5. The NERC SC has directed the RC SDT to solicit stakeholder feedback on what ‘critical facilities’ (relating to R2) should be monitored in adjacent Reliability Coordinator Areas. Please provide your input on this issue in the comment area.

**R2.** Each Reliability Coordinator shall know the current status of all critical facilities whose failure, degradation or disconnection could result in an SOL or IROL violation. Reliability Coordinators shall also know the status of any facilities that may be required to assist area restoration objectives.

Comments: Please consider this rewrite. Each Reliability Coordinator shall know the current status of all critical facilities whose failure, degradation or disconnection could result in an SOL or IROL violation. Reliability Coordinators shall *provide adjacent RC Areas with information that could lead to an IROL.*

6. If you have any other comments on the SAR that you haven't already provided in response to the previous questions, please provide them here.

Comments