

## **Informal Comment Form for Concept White Paper for Project 2009-02: Real-time Monitoring and Analysis Capabilities**

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Please **DO NOT** use this form to submit comments on the White Paper for Project 2009-02: Real-time Monitoring and Analysis Capabilities. This comment form must be completed by **April 4, 2011**.

If you have questions please contact Ed Dobrowolski at [ed.dobrowolski@nerc.net](mailto:ed.dobrowolski@nerc.net) or by telephone at 609-947-3673.

### **Background Information Concept White Paper for Project 2009-02: Real-time Monitoring and Analysis Capabilities**

The SDT has created this white paper to illustrate the concepts it intends to pursue as the project unfolds. The goal of the white paper is to solicit industry feedback on the concepts to serve as input to the eventual creation of standards and requirements on the topic of Real-time monitoring and analysis capabilities. The SDT is striving to emphasize capabilities and is not proposing to require the use of any specific tools.

The SDT is actively pursuing industry feedback and strongly encourages industry to provide alternatives to the concepts presented using specific language where possible.

**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 proposed Section 2 for the concepts on monitoring. Do you support these concepts? If you do not support these concepts, please specify why you disagree and include specific alternative language to resolve your concern.

Yes

No

Comments:

Article 2.1.1 - Is all status data scanned at 4 sec's? The requirement should be that the status be scanned at rates compatible with the installed equipment, with the eventual goal of 4 sec's. What is the technical basis and reliability objective for the 4 seconds? How are "report by exception" (RBE) status signals to be used? In general, please define a scan, specifically as it relates to Distributed Network Protocol (DNP), class or event scans.

Article 2.2 – Are all entities required to maintain separate availability records for each DCU (ie; RTU) scanned? This creates an additional set of computations that the EMS would be required to perform above that already being done. It may make it difficult to maintain the required scan rates of the equipment monitored due to overhead calc's being done.

Article 2.4 – we disagree that the System Operator should have approval authority for planned maintenance. The System Operator is an operator, not a maintenance planner

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and should have the ability to veto work being proposed due to system reliability issues such as during declared emergency or high congestion. He can make requests for work, and his request should have a high priority, but he is not the final authority on it. Was the intent to provide the system operator (or "real-time situations") with veto ability to postpone maintenance due to reliability reasons, and could the article as written have the unintended consequence of placing system operators in the approval and budgeting cycle of the EMS/IT groups?

2. The SDT has proposed Section 3 for the concepts on data exchange. If you do not support these concepts, please specify why you disagree and include specific alternative language to resolve your concern.

Yes, I agree with the concepts

No, I do not agree with the concepts

Comments:

Article 3.0 paragraph 3 – "Reliability Entity" is not a defined term in the "NERC Glossary of Terms". Please define the term or use another.

Article 3.1 – Requiring the use of diverse routing for ICCP connections is difficult and cost prohibitive. We suggest deleting this item and in its place utilize information from neighboring entities when there are issues with the ICCP connection. We believe if redundancy is required, then these redundant links should only be between the Registered Entity and the Reliability Coordinator. The key is to make the Reliability Coordinator aware.

Article 3.4 – we disagree that the System Operator should have approval authority for planned maintenance. The System Operator is an operator, not a maintenance planner and should have the ability to veto work being proposed due to system reliability issues such as during declared emergency or high congestion. He can make requests for work, and his request should have a high priority, but he is not the final authority on it. Was the intent to provide the system operator (or "real-time situations") with veto ability to postpone maintenance due to reliability reasons, and could the article as written have the unintended consequence of placing system operators in the approval and budgeting cycle of the EMS/IT groups?

3. The SDT has proposed Section 4 for the concepts on alarming. If you do not support these concepts, please specify why you disagree and include specific alternative language to resolve your concern.

Yes, I agree with the concepts

No, I do not agree with the concepts

Comments:

Article 4.4 – we disagree that the System Operator should have approval authority for planned maintenance. The System Operator is an operator, not a maintenance planner and should have the ability to veto work being proposed due to system reliability issues such as during declared emergency or high congestion. He can make requests for work, and his request should have a high priority, but he is not the final authority on it. Was

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the intent to provide the system operator (or "real-time situations") with veto ability to postpone maintenance due to reliability reasons, and could the article as written have the unintended consequence of placing system operators in the approval and budgeting cycle of the EMS/IT groups?

4. The SDT has proposed Section 4 for the concepts on Analysis. If you do not support these concepts, please specify why you disagree and include specific alternative language to resolve your concern.

Yes, I agree with the concepts

No, I do not agree with the concepts

Comments:

Article 4.3 Failure Notification – we do not agree with this concept. It will require a totally independent system which most, if not all, users do not have. The existing EMS can serve this function as well.

Could you expand upon your justification to include BA in this requirement?

For a local BA, could the BA have a process to verify concerns with the RC? We would assume this local BA would meet some reliability measure or threshold before the process is needed.

5. Are there any other capabilities that you feel are necessary to cover the general topic of Real-time monitoring and analysis capabilities. Please be as specific as possible in raising your ideas.

Comments:

Article 5.4 – we disagree that the System Operator should have approval authority for planned maintenance. The System Operator is an operator, not a maintenance planner and should have the ability to veto work being proposed due to system reliability issues such as during declared emergency or high congestion. He can make requests for work, and his request should have a high priority, but he is not the final authority on it. Was the intent to provide the system operator (or "real-time situations") with veto ability to postpone maintenance due to reliability reasons, and could the article as written have the unintended consequence of placing system operators in the approval and budgeting cycle of the EMS/IT groups?