

Comment Form — Second Draft of SAR for Backup Facilities

Please use this form to submit comments on the second draft of the SAR for Backup Facilities. Comments must be submitted by **March 16, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.com with the words "Backup Facilities" in the subject line. If you have questions please contact Ed Dobrowolski at ed.dobrowolski@nerc.net or by telephone at 609-452-8060.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
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NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs or ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations or Regional Entities

Background Information

The revised SAR clarifies that this project revises EOP-008-0, Plans for Loss of Control Center Functionality, to emphasize the continuation of functionality needed by Reliability Coordinators, Balancing Authorities, and Transmission Operators for reliable system operation regardless of the manner in which it is achieved.

The definition of backup capability that is pertinent to this effort is: the ability to maintain situational awareness and continue to comply with reliability standards when primary control center facilities are not operational, including consideration for communications required to explicitly support backup facilities.

The drafting team made several changes to the SAR based on stakeholder comments, including the following:

- Clarified that the work of the Operating Committee Backup Control Center Task Force will be used as one of the inputs to the revision of EOP-008
- Removed COM-001 from the list of standards included in the scope of this project
- Modified the SAR to clarify that there “may” be some requirements for backup capabilities in other reliability standards and added IRO-002 to the list of related standards because it does contain a backup facility requirement
- Clarified that Appendix B is an informative attachment that contains material for consideration in the standards revision process, but should not be considered to contain mandatory changes to the standard
- Clarified that the standard will apply to any entity for which the loss of its primary control capability would impose a significant real-time reliability risk to the Bulk Power System — and includes the Reliability Coordinator, Balancing Authority, Transmission Operator, and any entity (including the Transmission Owner) performing reliability functions as a result of delegation of tasks from those entities

Please review the revised SAR and then answer the questions in this comment form. Comments must be submitted by **March 16, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.com with the words “Backup Facilities” in the subject line.

You do not have to answer all questions.

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

1. The revised SAR shows the Transmission Owner as an applicable entity based on the concept that there are Transmission Owners that operate control centers that could potentially have impact on the reliability of the Bulk Power System. Do you agree that the standard drafting team needs to have the flexibility to address the issue of Transmission Owners as applicable entities in the drafting of the standard?

Yes

No

Comments: Even though we see value, from a reliability perspective, to have "large" TOs with control centers, to have back-up facilities, we are not comfortable with the idea of mandating this through a NERC standard. We strongly feel that the details of what TO backup facilities are necessary, should be dealt between the TOP and TO in their respective operating agreements.

2. The SAR drafting team has deleted COM-001 from the revised SAR based on the fact that COM-001 deals with generic communication issues and not backup facility issues. Communication support explicitly needed for backup facilities will be considered in the revision of EOP-008. Also, COM-001 is covered in other areas of the Reliability Standards Development Plan 2007–2009. On this basis, do you agree that COM-001 should be deleted from the scope of this SAR?

Yes

No

Comments:

3. Please highlight any other changes you feel are needed before this SAR is ready to move forward to standard drafting.

Comments: