

Comment Form — 2nd Draft of SAR for System Restoration and Blackstart

Please use this form to submit comments on the proposed SAR for System Restoration and Blackstart. Comments must be submitted by **March 9, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.com with the words "System Restoration SAR" 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, 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 and Regional Entities

Background Information:

This project involves upgrading the requirements in these four standards:

- EOP-005 — System Restoration Plans
- EOP-006 — Reliability Coordination – System Restoration
- EOP-007 — Establish, Maintain, and Document a Regional Blackstart Capability Plan
- EOP-009 — Documentation of Blackstart Generating Unit Test Results

The SAR drafting team posted the SAR for an initial comment period and stakeholders indicated agreement that there is a reliability-related need to upgrade the requirements in these four standards. Based on stakeholder comments, the SAR drafting team modified the SAR to improve clarity, and made the following significant changes:

- Updated the SAR form to reflect the terms used in the Functional Model V3 as directed by the Standards Committee and to reference the correct version of the standards
- Added more specificity to the 'Industry Need' and 'Brief Description' sections of the SAR
- Added language to clarify that the "To Do" list (renamed as an "Issues to be Addressed" list is a list of issues to consider in the refinement of the standards, not a list of modifications that must be made to the standards
- Modified the headings in "Standard Review Forms" to more clearly identify the source of the comments listed on those forms
- Added a copy of the "Standard Review Guidelines" to clarify the scope of modifications required to upgrade this set of standards and to identify the reference used by NERC staff in evaluating the quality of existing standards
- Added a new attachment to the SAR that includes additional issues that should be addressed during the refinement of the standards — these are issues raised by stakeholders during the first comment period for the System Restoration and Blackstart SAR.

The System Restoration and Blackout SAR Drafting Team would like to receive industry comments on Draft 2 of the SAR. Accordingly, we request that you include review the revised SAR, answer the questions on this form, and e-mail the form to sarcomm@nerc.com with the words "System Restoration SAR" in the subject line by **March 9, 2007**.

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. Do you agree with the revised scope of the proposed SAR?

Yes

No

Comments:

2. The SAR drafting team has checked off a large number of responsible entities as being applicable entities. We have done this in order to provide sufficient flexibility to the eventual standard drafting team and due to the fact that system restoration and blackstart can potentially touch so many different functional areas of operations.

Do you agree that the TOP should be responsible for securing blackstart services?

Yes

No

Comments:

3. The SAR DT has checked off a large number of responsible entities as being applicable entities. We have done this in order to provide sufficient flexibility to the eventual SDT and due to the fact that system restoration and blackstart can potentially touch so many different functional areas of operations.

Do you agree that a Generator Owner and/or Generator Operator should have a documented plan for non-blackstart units to be restarted after a blackout?

Yes

No

Comments: Each generator owner and/or generator operator should typically have a plan to be ready to re-start after a trip or blackout, when the power system is reenergized and conditions warrant. This readiness for energization should also apply to all distributors and loads connected to the bulk electrical system (BES) as well.

However, a NERC standard requirement(s) to have a documented plan for generating units to be restarted after a blackout should be limited to the 'restoration plan participants" on the cranking path only. The cranking path to be developed in the restoration plan would include those units that must be started or resynchronized to support the integrity of the path.

4. Do you agree that the SAR is ready to move forward to the standards drafting stage?

Yes

No

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Comments: Provided our comment in Q3 can be addressed in the final SAR that will be used by the SDT