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 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: Provide examples of what is meant by “Status Data” and “Analog Data”.

   The “availability” section should be deleted because the first requirement is already covered under the backup plan provisions in the EOP set of Standards, and oftentimes Responsible Entities have no control over the communications paths to get field data to the “central system”.

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: Applicability to “Generation Operator” should be “Generator Operator”. The details of the “data exchange agreements” are too prescriptive, especially the “data naming convention”. What defines a “complete data set (Section 3.3)? Is the “functional entity” reference intended to mean “Responsible Entity”? In Section 3.3
Failure Notification, what comprises notification of link failure to the System Operator?
If referring to link failure alarms, Section 3.4 should be worded appropriately to incorporate Section 3.3, and Section 3.3 could then be deleted.

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: Clarify what an “Uncommanded status change” is meant to include, and on what equipment. The volume of alarms received can be simulated in a development or power system simulator environment. Performance measures can be included.

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: This question is referring to Section 5. The analysis includes system changes “such as Load”, but is not proposed as applicable to the BA Function. The “results quality” section should be deleted. The System Operator understands when the tools are or are not presenting accurate results. In Section 5.2 Availability needs clarification. What situation is “What if” referring to? What is or are the “program” or “programs” being referred to? Is achieving “99% of the time” availability initially realistic?

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: It is not necessary to develop a standard to direct operators on how to monitor their systems in real time. Generator requirements are handled through existing operating agreements. This standard is dictating the requirements for monitoring.

The White Paper captures some common utility practices, but does not provide the fundamental justification and basis for those requirements. There presently exist a number of standards dealing with operational awareness, and communication. A gap analysis should be done with the existing standards considering real time tools. Standards could then be developed or revised to address any identified gaps, or provide necessary clarifications.