Unofficial Comment Form
2015-08 Emergency Operations – EOP-004-4

Do not use this form for submitting comments. Use the electronic form to submit comments on Project 2015-08 Emergency Operations; EOP-004-4 – Event Reporting. The electronic form must be submitted by 8 p.m. Eastern, Friday, January 6, 2017.

Additional information is available on the project page. If you have questions, contact Standards Developer, Laura Anderson (via email), or at (404) 446-9671.

Background Information

Project 2015-08 Emergency Operations (EOP) implements the recommendations of the Project 2015-02 Periodic Review Team (PRT), including the recommendation to revise EOP-004-3 Attachment 1, and retire Requirement R3. The EOP standards drafting team (SDT) considered those recommendations, along with additional input from the industry during the comment period on the project Standard Authorization Request (SAR) for this project. Additionally, the SDT has entered into collaborative efforts among NERC and the U.S. Department of Energy (DOE) to better align reporting requirements pursuant to EOP-004-3 and OE-417. Based on those inputs, the SDT proposes the changes to EOP-004-3 as indicated in this posting.

With respect to DOE collaboration, the SDT has discussed with DOE changes that would be necessary to EOP-004 Attachment 1 and to OE-417 to more closely align EOP-004-4 Attachment 1 Reportable Events with events reported on OE-417. Based on those discussions and the changes proposed in this posting, the SDT and DOE have made significant progress in harmonizing reporting requirements, which would relieve many entities from having to report Reportable Events on both forms. That collaboration continues, but it is important to note that regardless of whether OE-417 is harmonized with EOP-004-4 Attachment 1, entities will be required to report all Reportable Events as required by EOP-004-4.

The EOP SDT recommends the following changes to EOP-004-3:

- Update and clarify language in Requirements R1 and R2
- Retire Requirement R3
- Revise Attachment 1: Reportable Events and Attachment 2: Event Reporting Form

1 The review included EOP-004-3, EOP-005-2, EOP-006-2 and EOP-008-1 to evaluate, for example, whether the requirements are clear and unambiguous. Recommended revisions to EOP-005-2, EOP-006-2, and EOP-008-1 have been posted for comment and ballot in a separate posting.
Update and Clarify Requirements R1 and R2

The SDT proposes a conforming edit in Requirement R1 to reference the correct version number of EOP-004-4 assuming EOP-004-4 ultimately is approved. Specifically, reference to “EOP-004-3” has been changed to “EOP-004-4.” That conforming change also is made to Measure M1.

The SDT proposes to clarify in Requirement R2 that each Responsible Entity shall report events “specified in EOP-004-4 Attachment 1 to the entities specified” in its Operating Plan. The SDT proposes this addition to ensure the Responsible Entity is reporting on the event types and thresholds from EOP-004-4 Attachment 1. Additionally, the SDT proposes to clarify what constitutes a weekend for the purpose of implementing the requirement, i.e., “4 PM local time will be considered the end of the business day.”

The SDT proposes similar language and additional clarifications in Measure M2.

Retire Requirement R3

The SDT recommends retiring Requirement R3 under Criterion B1, administrative, because it requires responsible entities to perform a function that is administrative in nature, does not support reliability, and is needlessly burdensome. The SDT notes that contact lists are administrative in nature and should not be part of a mandatory reliability standard.

Revise Attachment 1: Reportable Events and Attachment 2: Event Reporting Form

The SDT proposes several changes to the Event Type, Entity with Reporting Responsibility, and Threshold for Reporting in response to SAR comments and its own analyses. The SDTs changes intend to: clarify appropriate Responsible Entity responsibilities; eliminate duplicative reporting by the Generator Operator (GOP) and Balancing Authority (BA); clarify Generation loss criteria specific to Quebec Interconnection and ERCOT Interconnection; and align reporting requirements OE-417 where appropriate. The SDT provided its reasoning in the redlined standard.

The SDT proposes several changes to Attachment 2 to clarify to whom the Event Reporting Form should be submitted and to more appropriately describe the “Event Identification and Description” field on the form.
Questions

1. Do you agree with the SDT’s recommended changes to EOP-004-3, Requirements R1 and R2? If you do not agree, or if you agree but have comments or suggestions on the SDT’s recommendation, please provide your explanation and suggested language.

☐ Yes
☐ No

Comments:

2. Do you agree with the proposed revisions to EOP-004-3, Attachment 1? If you do not agree, or if you agree but have comments or suggestions on the SDT’s recommendation, please provide your explanation and suggested language.

☐ Yes
☒ No

Comments: For the “Complete loss of monitoring or control capability at its staffed BES control center” Event Type, the “Threshold for Reporting” column should be revised as follows: “Complete loss of monitoring or control capability at its staffed BES control center for 30 continuous minutes or more, such that analysis capability (i.e., State Estimator or Contingency Analysis) is rendered inoperable.” The “Threshold for Reporting” language should continue to include the “such that [...]” language to maintain consistency with the EAP.

3. Do you agree with the proposed revisions to EOP-004-3, Attachment 2? If you do not agree, or if you agree but have comments or suggestions on the SDT’s recommendation, please provide your explanation and suggested language.

☐ Yes
☐ No

Comments:

4. Please provide any additional comments you have on the proposed revisions and clarifications to EOP-004-3.

Comments:

R2 of EOP-004-4 state:
Each Responsible Entity shall report events specified in EOP-004-4 Attachment 1 to the entities specified per their event reporting Operating Plan:
-by the later of 24 hours of recognition of meeting an event type threshold for reporting or
- by the end of the Responsible Entity’s next business day (4 p.m. local time will be considered the end of the business day).

The VSL Section state:

The Responsible Entity submitted an event report (e.g., written or verbal) to all required recipients more than 24 hours but less than or equal to 36 hours after recognition of meeting an event threshold for reporting.

By example, if an event occurred at midnight (12 a.m. Tuesday), the entity can submit a report by the end of the next business day (4 p.m. local time will be considered the end of the business day) which is Wednesday 4p.m. That means 40 hours after the event.

We suggest to remove this paragraph “The Responsible Entity submitted an event report (e.g., written or verbal) to all required recipients more than 24 hours but less than or equal to 36 hours after recognition of meeting an event threshold for reporting. OR” of the Lower VSL.

We suggest also modifying the moderate VSL as following: “The Responsible Entity submitted an event report (e.g., written or verbal) to all required recipients more than 40 hours but less than or equal to 48 hours after recognition of meeting an event threshold for reporting.”

1. In the section below, not sure why “Event Report” is capitalized? It seems that this “NOTE” intends to give an entity flexibility on the reporting timing, “under certain adverse conditions”, by differentiating between issuing a “written Event Report” and a “notification” (still to be done within timing requirements of R2), but I’m not sure this is the reasons for capitalizing “Event Report”?

**EOP-004 - Attachment 1: Reportable Events**

NOTE: Under certain adverse conditions (e.g. severe weather, multiple events) it may not be possible to report the damage caused by an event and issue a written Event Report within the timing in the standard. In such cases, the affected Responsible Entity shall notify parties per Requirement R2 and provide as much information as is available at the time of the notification. Submit reports to the ERO via one of the following: e-mail: systemawareness@nerc.net, Facsimile 404-446-9770 or Voice: 404-446-9780, select Option 1

2. For SDT’s consideration - Event Types in the Attachment 1 do not seem to capture GOP BES control centers (either evacuation or physical threats)?

- By capitalizing “Facility” in the Event Type for a “Physical Threat to its Facility”, since this term is defined in the NERC Glossary (and does not capture control center in the definition), this category excludes GOPs from reporting physical threats to their BES control centers under EOP-004.

- By excluding GOPs from the “Entity with Reporting Responsibility” list in the “Unplanned BES control center evacuation” Event Type, this category excludes GOPs from reporting evacuations from their BES control centers under EOP-004.
• Same as the bullet above for the “Complete loss of Interpersonal Communication capability at a BES control center”

Not sure if this is an intentional omission? CIP standards explicitly identify GOP control centers (High, Medium and Low Impact Rating) as subject to CIP requirements. CIP requirements are being implemented recognizing that there is an impact on BES from a CIP incident on a GOP control center, but EOP-004 doesn’t capture non-cyber events associated with the same facilities for reporting requirements – seems inconsistent.

At least High Impact GOP control centers, under the “Threshold for Reporting” should be considered for reporting requirements under EOP-004, for the events identified above.

This comment is being submitted recognizing that the current version of EOP-004-2 does not required this reporting either, for the same reasons identified in the three bullets above.