Unofficial Comment Form
2015-08 Emergency Operations

Do not use this form for submitting comments. Use the electronic form to submit comments on Project 2015-08 Emergency Operations; EOP-005-3 – System Restoration from Blackstart Resources, EOP-006-3 – System Restoration Coordination, and EOP-008-2 – Loss of Control Center Functionality. The electronic form must be submitted by 8 p.m. Eastern, Friday, August 12, 2016.

Additional information is available on the project page. If you have questions, contact Standards Developer Manager, Sean Cavote (via email), or at (404) 446-9697.

Background Information
Project 2015-08 Emergency Operations (EOP) implements the recommendations of the Project 2015-02 Periodic Review Team (PRT) that resulted from the PRT’s review of a subset of EOP Standards. The PRT comprehensively reviewed EOP-004, EOP-005, EOP-006 and EOP-008 to evaluate, for example, whether the requirements are clear and unambiguous.

The Periodic Review also included background information, along with associated worksheets and reference documents, to guide a comprehensive review that resulted in a Standard Authorization Request (SAR) based on the following PRT’s recommendations:

- EOP-004-2 – (1) Revise the standard and attachment and (2) retire Requirement R3;
- EOP-005-2 – Revise the standard;
- EOP-006-2 – Revise the standard; and
- EOP-008-1 – Revise the standard.

The four NERC Reliability Standards in the Periodic Review project concerned methodologies for restoring, reporting, and communicating Emergencies. Implementation of revisions and retirements recommended by the EOP PRT clarify the critical methodology requirements for Emergency Operations, while ensuring strong planning, reporting, communication and coordination across the Functional Entities. In addition, the revisions are intended to streamline the standards, while making the standards more Results-based.
Questions

1. Do you agree with the revisions and clarifications made by the EOP Standard Drafting Team to standard EOP-005-2? If you do not agree, or if you agree but have comments or suggestions for the proposed standard, please provide your recommendation and explanation.

☐ Yes
☒ No

Comments: In the first sentence of Requirement R1 the proposed revision is to have the Requirement read that “Each Transmission Operator shall develop and implement a restoration plan approved by its Reliability Coordinator.” However, to be consistent with the language that is already being proposed for EOP-006-3 Requirement 1 the revision should read that each Transmission Operator “shall develop, maintain and implement” a restoration plan approved by its Reliability Coordinator. The wording proposed for EOP-006-3 should be used in EOP-005-3.

Requirement R4 should be clarified to limit the type of System modifications that would require an update to the restoration plan solely to permanent System modifications that would change the Transmission Operator’s ability to implement its restoration plan.

A definition of System modification should be added to the NERC Glossary.

Or

Instead of the expression “System Modifications” in R4, “BES modifications would be a better choice. The NERC Glossary definition of BES includes “Blackstart Resource” in its inclusion list. I3 – Blackstart Resources identified in the Transmission Operator’s restoration plan.

2. Do you agree with the retirements proposed in EOP-005-3 of Requirement 7 and Requirement 8? If you do not agree, or if you agree but have comments or suggestions for the proposed standard, please provide your recommendation and explanation.

☒ Yes
☐ No

Comments: Assuming that Requirement R1 is being revised to state that the Transmission Operator shall “implement” a restoration plan approved by its Reliability Coordinator, Requirements R7 and R8 should be retired.
3. Do you agree with the revisions and clarifications made by the EOP Standard Drafting Team to standard EOP-006-2? If you do not agree, or if you agree but have comments or suggestions for the proposed standard, please provide your recommendation and explanation.

☐ Yes  ☐ No

Comments:

4. Do you agree with the retirements proposed in EOP-006-3 of Requirement 7 and Requirement 8? If you do not agree, or if you agree but have comments or suggestions for the proposed standard, please provide your recommendation and explanation.

☐ Yes  ☐ No

Comments: Assuming that Requirement R1 is being revised to state that the Transmission Owner shall “implement” a restoration plan approved by its Reliability Coordinator, Requirements R7 and R8 should be retired.

5. Do you agree with the revisions and clarifications made by the EOP Standard Drafting Team to standard EOP-008-1? If you do not agree, or if you agree but have comments or suggestions for the proposed standard, please provide your recommendation and explanation.

☐ Yes  ☐ No

Comments:

6. Do you agree with the Violation Risk Factors (VRFs) and Violation Severity Levels (VSLs) for the requirements in the proposed standards? If you do not agree, or if you agree but have comments or suggestions for the VRFs and VSLs your recommendation and explanation.

☐ Yes  ☐ No

Comments: It is suggested that the VSLs for EOP-005-3 be revised for clarification as follows:
R1--Severe VSL: The Transmission Operator does not have an approved restoration plan OR the Transmission Operator has an approved restoration plan but failed to implement it when a disturbance occurred, in accordance with Requirement R1.

R3--Lower VSL, Moderate VSL, High VSL and Severe VSL: delete the words “or confirmation of no change” in all of the VSLs to make the language consistent with the deletion of Part 3.1.

7. Please provide any additional comments for the EOP Standard Drafting Team to consider, if desired.

Comments:
In EOP-005-3 the effective date of the restoration plan should be defined.

Requirement R4 only takes into account the update and the submittal of the TOP plan to the RC for approval. Requirement R4 does not define the effective date of the TOP plan. On reading between the lines, it can be understood that the restoration plan should be effective no more than 120 (90+30) days following an unplanned System modification and prior to the implementation of a planned System modification.
The Drafting Team should consider the addition of a phrase to Requirement R4 to indicate that the TOP plan becomes effective following its approval by the RC.

Requirement R6 of EOP-005-3 requires verification and testing of the restoration plan at least once every five years. The Report on the FERC-NERC-Regional Entity Joint Review of Restoration and Recovery Plans recommended the re-verification or re-testing of the restoration plan when there are System changes that would affect the ability of the TOP to implement its restoration plan. The Drafting Team should consider the updating of Requirement R6 according to the recommendation or explain why this recommendation was not retained.