Unofficial Comment Form
Project 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 and EOP-006-3 – System Restoration Coordination. The electronic form must be submitted by 8 p.m. Eastern, Friday, December 9, 2016.

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) that resulted from the PRT’s review of a subset of EOP Standards. The Periodic Review 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 SDT to standard EOP-005-2, Requirement R4 and parts? 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:

2. Do you agree with the revisions and clarifications made by the EOP SDT, based on industry comments, to revise the language “at least once each 15 calendar months” back to “annual” or “annually,” as drafted in EOP-005-02? 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:

3. Do you agree with the revisions and clarifications made by the EOP SDT 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 revisions and clarifications made by the EOP SDT, based on industry comments, to revise the language “at least once each 15 calendar months” back to “annual” or “annually,” as drafted in EOP-006-02? 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:

5. Please provide any additional comments for the EOP SDT to consider, if desired.

Comments:
Based on the draft of RSAW, we suggest to add the obligation to submit to the TOP a corrective action plan on the R14 when the TOP testing requirement(s) are not met:

Actual requirement

**R14.** Each Generator Operator with a Blackstart Resource shall perform Blackstart Resource tests, and maintain records of such testing, in accordance with the testing requirements set by the Transmission Operator to verify that the Blackstart Resource can perform as specified in the restoration plan. [*Violation Risk Factor = Medium*] [*Time Horizon = Operations Planning*]

14.1. Testing records shall include at a minimum: name of the Blackstart Resource, unit tested, date of the test, duration of the test, time required to start the unit, an indication of any testing requirements not met under Requirement R7.

14.2. Each Generator Operator shall provide the blackstart test results within 30 calendar days following a request from its Reliability Coordinator or Transmission Operator.

Corrective action plan:

14.3 Each Generator Operator shall, within 10 calendar days of an indication of any testing requirements not met under Requirement R7: [*Violation Risk Factor: High*] [*Time Horizon: Operations Planning, Long-Term Planning*]

- Develop a Corrective Action Plan (CAP) for the identified Blackstart Resource, and an evaluation of the CAP’s applicability to the entity’s other Blackstart Resources including other locations; or
- Explain in a declaration why corrective actions are beyond the entity’s control or would not improve BES reliability, and that no further corrective actions will be taken.
- Submit the conclusion(s) to the Transmission Operator

Typo from M15 to be corrected in coordination with R15 requirement:

M15 Each Generator Operator with a Blackstart Resource shall have an electronic or hard copy of the training program material provided to its operating personnel responsible for the startup and energizing a bus of its Blackstart Resource generation units and a copy of its dated training records including training dates and durations showing that it has provided training in accordance with Requirement R15.