Unofficial Comment Form
Project 2009-03 Emergency Operations

Please **DO NOT** use this form for submitting comments. Please use the [electronic form](#) to submit comments on the Standard. The electronic comment form must be completed by **8 p.m. Eastern on Monday, October 20, 2014**.

If you have questions please contact Laura Anderson at [laura.anderson@nerc.net](mailto:laura.anderson@nerc.net) or by telephone at 404-446-9671.

**Project Page**

**Background Information**

This additional comment period is soliciting formal comment for EOP-011-1.

The Emergency Operations Standard Drafting Team (EOP SDT) merged EOP-001-2.1b, EOP-002-3.1 and EOP-003-2 to create EOP-011-1. This re-design enables the requirements for Emergency Operations to be streamlined into a clear and concise standard that is organized by Functional Entity in order to eliminate the ambiguity in previous versions. In addition, the revisions clarify the critical requirements for Emergency Operations and apply Paragraph 81 criteria, while making the standard more results-based and address outstanding directives from FERC Order No. 693.

The EOP SDT posted an initial draft of EOP-011-1 for a 30-day informal comment period March 28, 2014 through April 28, 2014. The EOP SDT has considered feedback from the informal comment period, as well as other extensive outreach, and many of the suggested changes were incorporated into the second draft of EOP-011-1. The second draft was posted for formal comment July 2, 2014 through August 15, 2014. The EOP SDT has considered the feedback received from stakeholders during the additional comment period, and a number of changes were made as a result.

Please enter comments in simple text format, **as bullets, numbers, and special formatting will not be retained** (even if it appears to transfer formatting when copying from the unofficial Word version of the form into the official electronic comment form).

- Separate discrete comments by idea, e.g., preface with (1), (2), etc.
- Use brackets [ ] to call attention to suggested inserted or deleted text.
- Insert a “check” mark in the appropriate boxes by double-clicking the gray areas.
• **Do not use** formatting such as extra carriage returns, bullets, automated numbering, symbols, bolding, italics, or any other formatting; this will not be retained when you submit your comments.

• Please do not repeat other entity’s comments. Select the appropriate item to support another entity’s comments. An opportunity to enter additional or exception comments will be available.

**Questions**

1. **EOP-011-1.** Do you agree with the changes made to EOP-011-1? If not, please specifically identify those changes that you do not agree with, the basis for your disagreement, and your proposed revisions to the language at issue.

   ☒ Yes  
   ☐ No

   Comments:

2. **Attachment 1.** Do you agree with the changes made to Attachment 1 of EOP-011-1? If not, please specifically identify those changes that you do not agree with, the basis for your disagreement, and your proposed revisions to the language at issue.

   ☐ Yes  
   ☒ No

Comments: In EEA 2, a bullet was added addressing the ability of the BA to maintain “minimum Contingency Reserve requirements”. This could be interpreted in two ways because of the use of the word “minimum”. It should be revised to avoid any misinterpretation.

The first interpretation is that the BA would declare an EEA level 2 event though the contingency reserve requirement, equal to the BA’s Most Severe Single Contingency as defined in BAL-002-1, Part 3.1, is fully met. If this is the SDT’s intent, then suggest the following language: “An energy deficient Balancing Authority is still able to maintain Contingency Reserve requirement.”

The second interpretation is that in EEA level 2, depletion of Contingency Reserve is allowed, however some minimum level(s) can still be maintained. These minimum levels are defined by local procedures and may be different from one BA to the other, based on local constraints. If this is the SDT’s intent, we then suggest the following language: “An energy deficient Balancing Authority is still able to maintain a minimum level of Contingency Reserve while Contingency Reserve may be depleted.”
For example, an entity has a Contingency Reserve requirement equal to its MSSC, which is normally 1000 MW. However, there is a minimum level of 250 MW that could be maintained in all cases in order to provide minimum levels of regulation and frequency responsive reserve. In this case, the second interpretation is the right one.

3. **Violation Risk Factors (VRF) and Violation Severity Levels (VSL).** The EOP SDT has made revisions to conform with changes to requirements and respond to stakeholder comments. Do you agree with the VRFs and VSLs for EOP-011-1? If you do not agree, please explain why and provide recommended changes.

- [ ] Yes
- [x] No

Comments:

4. Are there any other concerns with the proposed standard that have not been covered by previous questions and comments? If so, please provide your feedback to the EOP SDT.

- [x] Yes
- [ ] No

Comments: