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 Authorization Request (SAR). The electronic comment form must be completed by December 5, 2013.

If you have questions please contact Laura Anderson or by telephone at 404-446-9671.

All documents for this project are available on the project page.

Background Information
This posting is soliciting informal comment.

On April 22, 2013, the NERC Standards Committee appointed eight subject matter experts to serve on the EOP Five Year Review Team (FYRT). As part of its review, the EOP FYRT referenced background documents including 1) the previously-posted Project 2009-03 EOP SAR (posted 12/07/09 – 01/15/2010, and last modified on 11/05/2010); 2) the currently-enforceable EOP standards; 3) outstanding issues and directives pertaining to the EOP standards; 4) the Independent Experts Report; and, 4) Paragraph 81 criteria. Based on this review, the EOP FYRT developed a set of recommendations for EOP-001-2.1b, EOP-002-3.1 and EOP-003-2.

The EOP FYRT recommendations for EOP-001-2.1b, EOP-002-3.1 and EOP-003-2 were posted for a 45-day comment period from August 6, 2013 through September 19, 2013. There were 25 sets of responses, including comments from approximately 94 different people from approximately 58 companies, representing 8 of the 10 Industry Segments.

The EOP FYRT carefully considered the stakeholder comments received during the posting period and, based on comments, made revisions to its recommendations. To further support its recommendations, the EOP FYRT developed redlined versions of the standards and developed a supplemental SAR for Project 2009-03. Many improvements suggested by stakeholders during the comment period were incorporated into the final recommendations and redlined standards being provided to the Standards Committee.

Based on the EOP FYRT’s discussions and recommendations received during the comment period, the EOP FYRT recommends that the EOP SDT consider the following:

- EOP-001-2.1b, Requirements R1 and R8 should be considered for combination
- The EOP FYRT recommended merging EOP-001-2.1b and EOP-002-3.1 into a single standard and stakeholders agreed with this recommendation. Some stakeholders commented that EOP-003-2
should be included in the merger of EOP-001-2.1b and EOP-002-3.1; although the EOP FYRT did not fully support these comments, a recommendation was made in the Five-Year Review Templates for the future EOP SDT to consider merging these three standards into a single standard.

The complete recommendations of the EOP FYRT are in the attached Five-year Review Templates and redlined versions of the standards are provided as a starting point for the Project-2009-03-Emergency Operations drafting team.

This project addresses directives in Paragraph 573 of FERC Order No. 693\(^1\) and Paragraph 595 of FERC Order No. 693\(^2\) and provides additional clarity to many requirements, as well as retiring requirements that meet the criteria of Paragraph 81. Project 2009-03 addresses Emergency Operations and requires coordination with Project 2008-02 Undervoltage Load Shedding to ensure that duplicative requirements are not retained as PRC-010 is developed; therefore, the EOP FYRT considers this project to be high priority.

You do not have to answer all questions. Enter comments in simple text format. Bullets, numbers, and special formatting will not be retained.

Questions

1. The scope of this project includes:
   - Address Five-Year requirement for EOP-001-2.1b, EOP-002-3.1 and EOP-003-2
   - Improve quality, relevance and clarity of the standards
   - Bring standards into Results-Based format
   - Apply Paragraph 81 criteria and recommendations from Independent Expert Review Panel on standards EOP-001, -002, and -003
   - Coordinate with Project 2008-02 UVLS to eliminate duplicative requirements

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\(^1\) Order No. 693 at P 573 “Demand response covers considerably more resources than interruptible load. Accordingly, the Commission directs the ERO to modify the Reliability Standard to include all technically feasible resource options in the management of emergencies. These options should include generation resources, demand response resources and other technologies that meet comparable technical performance requirements.”

\(^2\) Order No. 693 at P 595: “The Commission directs the ERO to address the minimum load and maximum time concerns of the Commission through the Reliability Standards development process.”
Do you agree with this scope? If not, please explain.

☐ Yes
☐ No

Comments: With regard to EOP-001-2, R3 requires each TOP and BA to have an emergency plan and, as a minimum, the plan needs to include the tasks to be coordinated with and among adjacent TOPs and BAs. R4 requires the emergency plan to include the applicable elements in Attachment 1-EOP-001. There is no need for having two separate requirements each of which requiring the inclusion of certain elements to ensure reliable emergency operations. Propose to combine R3 and R4 by requiring each TOP and BA to develop an emergency plan that will include the tasks to be coordinated with and among adjacent TOPs and BAs and applicable elements in Attachment 1.

Regarding EOP-002-4, we disagree with the removal of R6. The response to comments by the 5-year review team indicates that this removal is consistent with P81 criteria, and the recommendations from the Independent Expert Review Panel Report. This is not the case since R6 spells out the actions a BA need to take when it is unable to meet DCS whereas the BAL standard (BAL-002) does not stipulate these actions. It only requires a BA or RSG to meet the DCS. It is conceivable that a BA that fails to meet DCS can elect to do nothing (since the requirement is already violated), thus exposing the system to a risk of a severe frequency excursion and potential collapse if another resource contingency occurs before the required reserve is replenished.

The removal of R9 should be reconsidered by the SDT. R9 has several parts, some of which could be removed because of technological advances and adequate coverage by the e-tag spec and/or other communication protocols. Part 9.1 should be retained because it still requires actions by the responsible entities such as the LSE and the RC, which cannot be replaced by technology or IT tools. The SDT should consider retaining the concept of Part 9.1.

Regarding EOP-003-3, given that R6 will be removed, review and revise R1. R6 as written addresses frequency problems and the results of UFLS operations only. R1 as written does not make this distinction, and it asks for load shedding – automatic and/or manual, to address transmission and resource problems. Without R6 and without revising R1, Responsible Entities may simply rely on automatic load shedding schemes (UFLS and UVLS) to address transmission and resource concerns without taking the next steps to implement manual load shedding after the automatic load shedding operations. We suggest the SDT to review the scope of R1, and revise it as necessary to cover both transmission and resource aspects using automatic and manual load shedding as remedial measures.
2. The SAR identifies a list of reliability functions that may be assigned responsibility for requirements in the set of standards addressed by this SAR. Do you agree with the list of proposed applicable functional entities? If no, please explain.

☐ Yes
☐ No
Comments:

3. Are you aware of any regional variances that will be needed as a result of this project? If yes, please identify the regional variance:

☐ Yes
☒ No
Comments:

4. Are you aware of any business practice that will be needed or that will need to be modified as a result of this project? If yes, please identify the business practice:

☒ Yes
☐ No
Comments: The proposed removal of Requirement R9 of EOP-002 may result in a need to introduce certain business practices in the NAESB standards, especially those parts of R9 that address elevating transmission service priority in an emergency. Refer to our comments to Question 2 above that raise a concern over the complete removal of R9.

5. Are you aware of any Canadian provincial or other regulatory requirements that may need to be considered during this project in order to develop a continent-wide approach to the standard(s)? If yes, please identify the jurisdiction and specific regulatory requirements.

☐ Yes
☒ No
Comments:

6. If you have any other comments on this SAR that you haven’t already mentioned above, please provide them here:

Comments: