Unofficial Comment Form
Project 2015-02 Periodic Review of Emergency Operations

DO NOT use this form for submitting comments. Use the electronic form to submit comments on the draft Periodic Review Recommendation on the EOP body of standards. A group of Periodic Review templates that shows the scope of the recommended changes is also posted for information. The electronic comment form must be completed by 8:00 p.m. ET May 11, 2015.

If you have questions please contact Laura Anderson (via email) or by telephone at 404.446.9671.

Project 2015-02 Periodic Review of Emergency Operations Project Page

Background Information

This periodic review project will review the following four EOP standards.

- EOP-004-2 – Event Reporting
- EOP-005-2 – System Restoration from Blackstart Resources
- EOP-006-2 – System Restoration Coordination
- EOP-008-1 – Loss of Control Center Functionality

Review of the EOP standards was initially delayed to allow the Electric Reliability Organization and industry to gain compliance experience with revisions to the standards that became enforceable in 2013 and early 2014.

The EOP periodic review team (EOP PRT) will use the background information, along with any associated worksheets or reference documents (such as the Independent Expert Review Project report, and Paragraph 81 criteria) to guide a comprehensive review that results in a recommendation from one of the following three (3) choices:

1. Recommend re-affirming the Standard;
2. Recommend revising the Standard; or
3. Recommend retirement of the standard.

If the PRT recommends a revision to, or a retirement of, the standard, it must also submit a Standard Authorization Request outlining the proposed scope and technical justification for the revision or retirement.

The four NERC Reliability Standards in this Periodic Review project concern methodologies for planning for, reporting, and communicating Emergencies. The drafting team has considered the results of the quality review and decided upon appropriate changes for a 45-day informal posting/comment period.
Questions

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

1. The EOP PRT’s initial recommendation outlines three (3) clarifying revisions to Attachment 1 of EOP-004-2. Do you agree with the EOP PRT’s recommended revisions? If not, please explain specifically what aspects of the recommendation you disagree with.

☐ Yes
☒ No

Comments: Regarding the four bullets that are listed under Item 2c on pages 4 and 5:
First bullet--It is a good idea for adding information for including physically and digitally surveying control houses. What constitutes a digital survey? Also, the surveys should not be limited to control houses. There are installations where freestanding control panels are mounted outside of control houses.

We propose the following wording for the “Event Type” of “Physical threats to a facility” listed in Attachment 1:

“Physical threat to its Facility excluding weather or natural disaster related threats, which has the potential to degrade the normal operation of the Facility.
OR
Suspicious device or activity at a Facility, where “suspicious activity” means any observed behavior reasonably indicative of criminal intent to degrade normal operation of a BES facility, unless verified to be otherwise within the R2 reporting timeframe (i.e., 24 hours).
Do not report theft unless it degrades normal operation of a Facility.”

It would also be beneficial to define the term “suspicious activity” since it shows up repeatedly throughout the standard.

Third bullet--Agree.

Fourth bullet--Agree.
2. The EOP PRT is not proposing any retirements to the requirements of EOP-004-2 per the Paragraph 81 criteria and has provided justification for not retiring the requirements that the IERP recommended retiring. Do you agree with the EOP PRT’s recommendations? If not, please explain.

☐ Yes
☐ No
Comments:

3. Do you agree with the initial recommendation of the EOP PRT regarding EOP-004-2? If not, please explain specifically what aspects of the recommendation you disagree with.

☐ Yes
☐ No
Comments:

4. If you have any other comments that you have not already mentioned above, on the Periodic Review recommendation, please state it specifically for EOP-004-2.
Comments: Requirement R3 is administrative, and should be a Paragraph 81 candidate.

Coordination with the Event Analysis Program is imperative if Categories being analyzed are to line-up with those being reported (notification) in EOP-004-2. The original intent was to do this so as to not burden or confuse industry on what needs to be reported and analyzed. The Process Review team needs to coordinate with the Event Analysis Subcommittee to accomplish this task. This may have to be requested of the SC to correct the standard in order to realign the standard with the EA event categories.