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.

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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. Bullet points, numbers, and special formatting will not be retained.

1. The EOP PRT’s initial recommendation outlines three (3) clarifying revisions to EOP-006-2. 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 Item a. on page 4--Suggest revising Part R1.5 to read:
R1.5  Criteria and conditions for reestablishing interconnections between Transmission Operators within its Reliability Coordinator Area, with adjacent electrically interconnected Transmission Operators in other Reliability Coordinator Areas, and with electrically adjacent Reliability Coordinators.

Item b.--Agree.

Item c.--Agree.

2. The EOP PRT is proposing not to retire three (3) requirements in EOP-006-2 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: Requirement R8 can be retired. Resynchronization is inherent in any restoration plan.

Agree that Requirement R10 should not be retired.

Recommend that Requirements R7 and R8 be incorporated into Requirement R1. The already-approved industry terminology “develop, maintain and implement” should be incorporated into EOP-005-2. By adding that terminology in Requirement R1, the language of Requirements R7 and R8 can be moved to Requirement R1. This is consistent with the structure of other reliability standards [e.g., EOP-001-2.1b R2 (and future successor EOP-011-1, Requirements R1 and R2), EOP-010-1 Requirements R1 and R3 and TOP-004-2 Requirement R6]. Therefore, recommend retiring Requirements R7 and R8, and moving the language of Requirements R7 and R8 into Requirement R1. Specifically, Requirement R1 should be revised as follows:
• The first sentence in Requirement R1 should be revised to state: "Each Reliability Coordinator shall develop, maintain and implement a Reliability Coordinator Area restoration plan."

• Part R1.2 should be revised to address elements of Requirement R7 (which then allows Requirement R7 to be retired): “Operating Processes for restoring the interconnection that address working with its affected Generator Operators and Transmission Operators as well as neighboring Reliability Coordinators, to monitor restoration progress, coordinate restoration and take actions to restore the BES frequency within acceptable limits."

• The EOP PRT recommended a modest revision to Part R1.5 (adding the work “adjacent”). While we agree with the concept of the suggested change to Part R1.5, suggest a more extensive revision that addresses both the concept of the change recommended by the EOP PRT and that also addresses elements of Requirement R8 (which then allows Requirement R8 to be retired): "Criteria and conditions for the Reliability Coordinator to authorize and coordinate the resynchronizing of all islanded areas that bridge boundaries between Transmission Operators within its Reliability Coordinator Area, and between its Reliability Coordinator Area and Transmission Operators and Reliability Coordinators in adjacent Reliability Coordinator Areas."

• A new part should be added to R1 (best to be placed as Part R1.9, with the currently effective Part R1.9 renumbered to become Part R1.10). The new part should state: “Restoration strategies to facilitate restoration, including resynchronizations, if the restoration plan cannot be executed as expected.”

3. The EOP PRT does propose retiring one (1) requirement and four (4) Requirement Parts in EOP-006-2. Do you agree with the EOP PRT’s recommendations? If not, please explain.

☐ Yes
☒ No

Comments: Agree with the retirement of the requirement and the THREE requirement Parts listed on page 3. Agree with the retirement of requirement R9, however, as posted on the NERC website, PER-005-2 has yet to be filed with the regulatory authorities.

Agree that Requirement R9, as well as Requirement 1, Parts R1.3 and R1.4 should be retired. [Note: the EOP PRT proposed to retire only three Requirement Parts (R1.2, R1.3, and R1.4), not four as stated in this question]. However, as described above, suggest that Requirement R1 Part 1.2 be retained and revised to capture Requirement R7 (which would be retired). Additionally, after revising Requirement 1, Part 1.5 as described above, Requirement R8 can also be retired.
4. Do you agree with the initial recommendation of the EOP PRT regarding EOP-006-2? If not, please explain specifically what aspects of the recommendation you disagree with.

☐ Yes
☒ No

Comments: Once R7 is retired and its language is incorporated into R1, the EOP PRT’s recommendation under 2.c. becomes moot [Note: the EOP PRT should have included a similar recommendation for R8, but that recommendation also becomes moot once R8 is retired and its language is moved to R1 as described above].

5. If you have any other comments that you have not already mentioned above, on the Periodic Review recommendation, please state it specifically for EOP-006-2.
Comments: