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 August 15, 2014.

If you have questions please contact Laura Anderson at laura.anderson@nerc.net or by telephone at 404-446-9671.

Project Page

Background Information
This posting is soliciting formal comment.

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 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, including the following:

- The qualifying phrase “Operator-Controlled” has been added preceding “manual Load shedding” in Parts of Requirements R1 and R2. Automatic Load shedding schemes are an important backstop against cascading outages or system collapse. If an entity manually sheds a Load which was included in an automatic scheme, it reduces the effectiveness of that automatic scheme. The EOP SDT acknowledges that, in the formulation of manual Load shedding plans, complete exclusion of Loads armed for automatic Load shedding may not be possible. Each entity should, however, evaluate their automatic Load shedding schemes and coordinate their manual plans so that overlapping use of Loads is avoided to the extent reasonably possible.

- Requirement R3 (along with its associated Measure M3) was removed from the Standard. The EOP SDT has placed the requirement to coordinate plans on the Balancing Authority (Requirement R2, Part 2.5) and on the Transmission Operator (Requirement R1, Part 1.3).
• The EOP SDT agrees with stakeholders that Requirement R5 of EOP-011-1 draft 1 is a parallel to TOP-001-1a and removed Requirement R5 (along with its associated Measure M5) from the Standard.

The EOP SDT received several comments regarding Reliability Coordinator approval of Balancing Authority and Transmission Operator Emergency Operating Plans. Paragraph 548 of Order No. 693 directed that the Reliability Coordinator be included as an applicable entity in EOP-002, and the SDT has carefully considered how to address this directive in EOP-011-1. While plan approval by the Reliability Coordinator is not specifically required by the directive in Order No. 693, the EOP SDT believes that approval by the Reliability Coordinator reduces risk to reliability of the BES.

Other changes were made in response to comments from several stakeholders including:

• Incorporating the notification requirement of Requirement R6 of EOP-011-1 draft 1 within Requirement R2. (Requirement R6 and its associated Measure M6 were removed from the Standard).
• Replaced the words “as soon as practicable” with “as soon as practical” to communicate that timeliness is important, while balancing the concern that in an Emergency there may be a need to alleviate excessive notifications on Balancing Authorities and Transmission Operators.
• Explained in the rationale of Requirement R1 that “Emergency Operating Plan” within the requirements of EOP-011-1 is not intended to be a newly-defined Glossary term; rather, the phrase is a combination of two existing Glossary terms, “Emergency” and “Operating Plan.”
• Removed “Load-Serving Entity” from Requirement R9 of EOP-011-1 draft 1 (which has become Requirement R5 of EOP-011-1 draft 2).
• Removed “NERC” from “Energy Emergency alert.”
• Restored the previous alert levels of Attachment 1.
• In coordination with the Project 2010-14.1 BARC drafting team, the EOP SDT has revised Attachment 1 to remove “Operating Reserves” from EEA 2 and to place “Operating Reserves” in EEA 3, to align with BAL-002-2 that is being developed in that project.

Coordination with Project 2008-02 Undervoltage Load Shedding

Project 2008-02 Undervoltage Load Shedding (proposed PRC-010-1) is posted concurrently. Requirements R2, R4, and R7 in EOP-003-2 – Load Shedding Plans are proposed to be replaced by requirement R1 in the proposed PRC-010-1. Stakeholders may wish to review both projects with respect to the transition of these requirements. Both projects and their implementation plans are being closely coordinated to ensure that there is no gap or duplication of requirements created by the work of the two teams.

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. Based on comments from stakeholders, the EOP SDT has added the term “Operator-Controlled” preceding the language “manual Load shedding” in Parts of Requirements R1 and R2. Do you agree with this revision? If not, please provide specific suggestions for change in the comment area.

☐ Yes
☐ No

Comments: For consistency with the Rationale listed for R2 pertaining to “If any Parts of Requirement R2 are not applicable”, a similar statement should be listed under the Rationale for R1. Suggest adding the wording: “If any Parts of Requirement R1, Part 1.2 are not applicable, the Transmission Operator should note ‘not applicable’ in their plan.”

2. Based on comments from a majority of stakeholders, the EOP SDT removed Requirement 3 from EOP-011-1 draft 1 and has placed the requirement on the Balancing Authority and Transmission Operator to coordinate their Emergency Operating Plans with impacted Balancing Authorities and Transmission Operators. Do you agree with this revision? If not, please provide specific suggestions for change in the comment area.

☐ Yes
☐ No

Comments: We agree that Emergency Operating Plans should be coordinated.

3. The EOP SDT received several comments regarding Reliability Coordinator approval of Balancing Authority and Transmission Operator Emergency Operating Plans. The FERC directive in Paragraph 548 or Order 693 mandates that the Reliability Coordinator be included as an applicable entity; while plan approval by the Reliability Coordinator was not a specific mandated intent, the EOP SDT believes that approval by the Reliability Coordinator reduces risk to reliability of the BES. Do you agree with this approach? If not, please provide specific suggestions for change in the comment area.

☐ Yes
☐ No

Comments: We are concerned with the RC obligation to simply approve the TOP/BA EOPs. It implies that approval could be checking compliance. The Requirement or the Technical Guidance should provide direction and meaning to the approval. If the SDT was to codify the requirement then we would like to suggest language consistent with EOP-006. Suggest:
R3. Each Reliability Coordinator shall review the Emergency Operating Plans (EOPs) of the Transmission Operators and Balancing Authority within its Reliability Coordinator Area.

3.1 The Reliability Coordinator shall determine whether the Transmission Operator’s or Balancing Authority’s EOP is coordinated and compatible with the Reliability Coordinator’s EOP and other Transmission Operators’ EOPs within its Reliability Coordinator Area. The Reliability Coordinator shall approve or disapprove, with reasons stated, the Transmission Operator’s or Balancing Authority’s submitted EOP within 30 calendar days following the receipt of the EOP from the Transmission Operator or Balancing Authority.

As an alternative, a section in the Guidelines and Technical Basis could be written to provide guidance. The RC role in the TOP or BA process to develop an EOP can vary based on the quantity of Emergency Operating Plans being submitted. When an RC provides its approval of a submitted EOP the RC must review the submitted EOP to verify it is compatible and coordinated with the RC’s overarching emergency operating plans developed for its Wide Area responsibility.

4. The EOP SDT has removed Requirement R5 from EOP-011-1 draft 1, as it is redundant with currently-enforceable TOP-001-1a. Do you agree with this revision? If not, please explain in the comment area below.

☐ Yes
☐ No
Comments:

5. The EOP SDT has revised Attachment 1, removing “Operating Reserves” from EEA 2 and adding “Operating Reserves” into EEA 3. Do you agree with this change? If not, please explain in the comment area below.

☐ Yes
☒ No
Comments: The proposed move of utilizing Operating Reserve (OR) from EEA 2 to EEA 3 does not present any problems. However, we are concerned with the added sentence that “In this situation, the requesting BA must be able to shed an amount of firm Load in order to meet its Operating Reserve requirement.” The sentence needs to be clarified. Even though the statement doesn’t stipulate that load has to be shed, having to shed load can be construed. We do not agree that the deficient BA needs to shed firm load to meet the Operating Reserve requirement. Operating Reserve is carried to guard against demand variations and contingencies resulting from a loss of generating resource or import, and system contingencies. A BA should only shed load if a contingency occurs necessitating load reduction to restore system operation within well-defined limits. You do not operate to shed firm load to avoid having to shed firm load.
The conclusion that may be reached is that a BA is required to shed firm load prior to committing its remaining Operating Reserves. This can be clarified by rephrasing to: In this situation, the requesting BA must be able to have an amount of firm Load shed if necessary to supplement its remaining Operating Reserves in order to meet its Operating Reserve requirement.

6. Do you agree with the VRFs and VSLs in EOP-011-1? If not, please indicate which Requirement(s) and specifically what you disagree with, and provide suggestions for improvement.

☐ Yes
☒ No

Comments: The Time Horizon for R1, R2 and R3 is currently Operations Planning. This should be Long-Term Planning. The definition of the two horizons are; Long-term Planning — a planning horizon of one year or longer. And Operations Planning — operating and resource plans from day-ahead up to and including seasonal. The EOP is developed for a period greater than a season.

The condition “did not do so as soon as practical” in the HIGH VSL for R4 cannot be determined with any certainty or supported evidence. R4 itself need to be revised to provide the measurability to support compliance assessment. Please see the comment under Q7 regarding R4.

We suggest revising the Medium VSL for R5 to Lower since failure to notify others that the alert has ended does not result in any unreliable operations.

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

Comments: The Drafting Team should revise the Evidence Retention section of this standard which is very specific requiring the retention of all versions of the EOP within the audit period. This is inconsistent with the allowed practice of maintaining detailed revision history within the current version. With the possible use of RAI to extend audit cycles (which could increase the time between TOP audits to more than 3 years), TOP and BA’s will be maintaining versions of EOP solely for backward horizon compliance monitoring. A more effective approach is to require the TOP and BA to retain the current version with revision history and utilize spot checking to monitor compliance.
The wholesale replacement of “Energy Deficient Entity” with “Requesting BA” results in some inconsistency with Condition (1) in the General Responsibility A.1 of Attachment 1, which indicates that a RC may initiate an EEA on its own request. Clearly, a RC will likely issue an EEA when it identifies a BA(s) in its RC Area is anticipating or experiencing energy deficiency. Nonetheless, the use of “Requesting BA” only in the rest of Attachment 1 fails to address the cases where a BA is energy deficient but it does not request its RC to initiate an EEA; rather, it is the RC that initiates the EEA before being requested. We suggest the SDT to consider replacing “Requesting BA” with “Energy Deficient BA” or simply reinstate the phrase “Energy Deficient Entity”.

EOP-011-1 Parts 1.2 and 2.4 should retain the phrase to ‘include the applicable elements’ below, and remove the phrase ‘at a minimum’. This would be consistent with the previous language contained in existing EOP-001 R4 and allow for solutions that do not exist or are not ‘applicable’ in certain areas.

Is “impact” a measurable word that should be in the standard? In sub-Part 1.2 and Part 2.5 the TOP and BA are required to coordinate with impacted TOP and impacted BA. Impacted could mean electrically affected by the EOP or it could mean having a role to play in executing the EOP. In R4 the ambiguity in impact is similar. Guidance or clarity is needed around this term.

R2 – For consistency with Part 1.1 remove ‘and implement’ from Part 2.1 (this is not struck on the redlined version, but it does show that it has been removed on the clean version).

R2 – For consistency with R1; the content of Parts 2.2 and 2.3 should be moved as sub-Parts below Part 2.4 instead of included as standalone Parts 2.2 and 2.3.

R2- The requirement appears to use a newly capitalized term “Capacity”. This term is not included in the NERC Glossary of Terms currently posted. If the intent is to use the existing defined terms, Capacity Emergency and Energy Emergency, then the SDT needs to write the requirement accordingly.

Regarding requirement R4, first, requirement R4 is not measurable since there is no clear yardstick for “as soon as practical”. This concept was a challenge in the development of FAC-003-3. In FAC-003-3 the phrase “without any intentional time delay” was used, or consider adding language similar to TOP-001-2 requirement R5 that uses the phrase “unless conditions do not permit such communications.”

Secondly, the Drafting Team should consider removing EOP-011 R4 since it is redundant to the following requirements:
- IRO-015-1 R1 requires RC’s to communicate notifications that impact neighboring RC’s
- EOP-002-4 R2 requires BA’s to communicate notifications that impact neighboring BA’s
- TOP-001-2 R5 requires TOP’s to communicate notifications that impact neighboring TOP’s
Finally, the draft IRO-014 R3 may introduce double jeopardy for non-compliance. The SDT should coordinate with the Project 2014-03 Revisions to TOP and IRO Standards Drafting Team IRO-014-3 requirement R3 and EOP-011-1 requirement R4. Those two requirements are very similar. It could argued that receiving a notification of an Emergency results in the RC identifying an actual emergency and then both EOP-011-1 and IRO-14-3 require the RC to notify other RC’s. EOP-011-1 then goes further and requires the RC to notify other TOPs and BAs. The notification to other RCs is covered by these two Standards. This double jeopardy needs to be addressed.