Unofficial Comment Form
Project 2015-08 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 8:00 p.m. Eastern, Wednesday, August 19, 2015.

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

Background Information
This posting is soliciting informal comment.

On February 3, 2015, the Standards Committee appointed the Project 2015-02 Emergency Operations Periodic Review Team (EOP PRT) and tasked them to review the following standards:

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

Based on this review, the EOP PRT developed a set of recommendations for EOP-004-2, EOP-005-2, EOP-006-2, and EOP-008-1. The EOP PRT recommendations were posted for a 45-day comment period from March 27, 2015 through May 11, 2015.

The EOP PRT carefully reviewed and considered the comments received during the posting period and, based on stakeholder comments, made revisions to the initial recommendations. To support consideration and implementation of these recommendations, the EOP PRT developed a new Standards Authorization Request (SAR). Many improvements suggested by stakeholders during the comment period were incorporated into the final recommendations.

The recommendations of the EOP PRT are as follows:

- EOP-004-2 – (1) Revise the standard and attachment and (2) retire Requirement R3;
- EOP-005-2 – Revise the standard;
- EOP-006-2 – (1) Revise the standard and (2) retire Requirements Parts R1.2, R1.3, and R1.4; and
- EOP-008-1 – Revise the standard.

Additional documents developed to support the Project 2015-02 team’s recommendations have been posted to the 2015-02 EOP PRT project page, including: 1) the EOP PRT’s consideration of comments on
the draft recommendations; 2) Department of Energy OE-417 Comparison of Reporting; 3) and Standards Independent Experts Review Project.

The EOP PRT has reviewed and developed a recommendation based upon the language of Federal Energy Regulatory Commission (Commission) Order no. 749\(^1\), as follows:

“[N]ERC, in its comments about the term, states that it “could promote the development of a guideline to aid registered entities in complying with Requirement R11.” The Commission notes that this Reliability Standard will not become effective for at least 24 months, during which time ambiguities in language or differences of opinion among affected entities may be resolved in practical ways. Once the Standard is effective, if industry determines that ambiguity with the term arises, it would be appropriate for NERC to consider its proposal to develop a guideline to aid entities in their compliance obligations.”\(^2\)

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:

   - Implement the recommendations of the periodic review team related to the following standards:
     - EOP-004-2
     - EOP-005-2
     - EOP-006-2
     - EOP-00801
   - 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

   Do you agree with this scope? If not, please explain.

     ☒ Yes
     ☐ No

   Comments: We have the following concerns for EOP-004:

   There is a need to clarify the obligations of the Responsible Entities listed in Attachment 1.

   On page 10 of EOP-004-2, when there is a loss of firm load \(\geq 300\) MW for entities with a previous year’s demand \(\geq 3,000\) MW, or \(\geq 200\) MW for all other entities, the BA, TOP or DP is held responsible

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\(^2\) Id. at P24.
for reporting. It is unclear as to the MW in relation to which particular entity’s previous year’s demand, and whether or not all three entities are responsible for reporting, or just one of them needs to report, and if so, which one of the three? Also, if it is meant to be one of the three, it is not clear whether or not the location or area within which the load loss occurs would dictate which one of the three entities has that obligation.

When the loss of load occurs in a distribution system, is it the DP’s obligation to report? Likewise, is the TOP obligated to report when the loss involves those loads that are tapped off the transmission network? Depending on the answer to the above, what is the role of the BA? If all three are obligated to report, the requirement makes it cumbersome and redundant to have all three entities file reports to the recipient entities/authorities.

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:
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: An effort to coordinate Event Reporting obligations across agencies should be undertaken. Currently, entities are required to report to NERC and to the DOE, potentially in different time frames and with a different level of detail. If these could be made more consistent moving forward, it would reduce the administrative burdens associated with Event Reporting. This should be added to the scope of the SAR for consideration.

The Ontario Energy Board (Ontario energy regulator) has in place electricity reporting requirements for Ontario distribution providers. Loss of Supply is an electricity reporting requirement that is filed by Ontario distribution providers to the Ontario Energy Board (and not the Ontario IESO which is the RC, BA and TOP for the Ontario integrated grid).

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

Comments: In the Detailed Description section of the SAR, the sentence “There are no market interface impacts resulting from the standard action on the implementation of the Project 2015-02, EOP PRT’s recommendations.” should be revised. There are no direct impacts to the market interface from “the standard action on the implementation of the Project 2015-02, EOP PRT’s recommendations.”

“The EOP Periodic Review Team (EOP PRT) is recommending that the future Standards Drafting Team (SDT) revise Requirement 1 part R1.1 to provide clarity, as the team determined it would be difficult to establish a timing requirement to restore primary control center functionality given the range of events that could render the primary control center inoperable”. Considering a system reliability need for generation, there are entities that have market interface equipment in their primary control center only. If the primary control center becomes inoperable it will have an effect on how fast an entity is able to get generation online in order for support. Please change the language to “direct impacts” instead.

It is recognized that continued operation of a market is not a reliability issue; in this situation, manual dispatch should continue to occur.
Suggest that any update to EOP-004-2 should include a re-synchronization of the EOP-004’s Attachment 1 (Reportable Events) with the list of Categories in the ERO’s Event Analysis Process – Version 3 document. Any change to EOP-004 going forward should consider the latest version of the EAP.