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 draft Five-Year Review Recommendation on the EOP body of standards. A group of Five-Year 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 September 19, 2013.

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

Project 2009-03 Emergency Operations Five-Year Review Project Page

Background Information
The Standards Committee assigned eight subject matter experts to review the EOP standards as part of NERC’s obligation to conduct periodic reviews of its standards. The Five-Year Review Team recommends certain revisions to the EOP standards to provide greater clarity and to sharpen industry focus on tasks that have a more direct impact on reliability. As required by the NERC Standard Processes Manual, this recommendation is being posted for stakeholder comment prior to being finalized and submitted to the Standards Committee.

EOP-001-2.1b: The EOP FYRT recommends retiring Requirements R3.1, R6.1 and R6.3 under Criterion B7 of Paragraph 81; Requirement R3.2 under Criterion B7 and Criterion A of Paragraph 81; Requirement R3.4 under Criterion B1 and Criterion A of Paragraph 81; Requirement R6.2 under Criterion B6 of Paragraph 81; and Requirement R6.4 under Criterion A of Paragraph 81.

The EOP FYRT further recommends revising and merging EOP-001-2.1b and EOP-002-3.1 into one standard; revising Requirements R1, R2 and R5; and a review of Attachment 1.

EOP-002-3.1: The EOP FYRT recommends retiring Requirements R1 and R6 under Criterion B7 of Paragraph 81; and Requirement R9 under Criterion A of Paragraph 81.

The EOP FYRT further recommends that EOP-001-2b and EOP-002-3.1 be revised and merged into one standard and revisions are recommended for Requirement R8 and Attachment 1.

EOP-003-2: The EOP FYRT recommends retiring Requirements R5 and R6 under Criterion B7 of Paragraph 81. Requirements R2, R4 and R7 are recommended to be moved to PRC-010-0.
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. Do you agree with the recommendation regarding EOP-001-2.1b? If not, please explain specifically what aspects of the recommendation you disagree with.
   - [ ] Yes
   - [x] No
   Comments: EOP-001 R6.4 should be deleted. There should already be processes in place to deliver electrical energy. This should be left to the generators using normal processes.

2. Do you agree with the recommendation regarding EOP-002-3.1? If not, please explain specifically what aspects of the recommendation you disagree with.
   - [ ] Yes
   - [ ] No
   Comments:

3. Do you agree with the recommendation regarding EOP-003-2? If not, please explain specifically what aspects of the recommendation you disagree with.
   - [ ] Yes
   - [ ] No
   Comments:

4. If you have any other comments on the EOP Five-Year Review Recommendations that you have not already mentioned above, please provide them here:
   Comments: EOP-001-2.1.b Attachment 1 should be further reviewed as it relates to the GOP in light of recent BES events, specifically Cold Weather Events. Also, add EOP-003 into the merger of EOP-001 & EOP-002. It seems to me that the justification for merging EOP-001-2.b (Emergency Operations Planning) and EOP-002-3.1 (Capacity and Energy Emergencies) into one standard (which I agree with) would also apply to including EOP-003-3 (Load Shedding Plans) in the merger. There are redundancies between EOP-001 and EOP-003 that could be eliminated. With the recommended elimination of R2, R4, R5, R6 & R7 from EOP-003-2, there would only be three requirements (R1, R3 & R8) to merge into EOP-001. Recommend that the remaining requirements (R1, R3 & R8) be merged into EOP-001.