Project 2009-03 Emergency Operations
EOP-011-1 – Emergency Operations Informal Comment Period
Unofficial Comment Form

Instructions
Please DO NOT use this form for commenting. Please use the electronic comment form to submit comments on the proposed EOP-011-1. Comments must be submitted by 8 p.m. April 28, 2014. If you have questions please contact Laura Anderson or by telephone at 404-446-9671.

Background Information
EOP-011-1 is a new standard that consolidates requirements from three existing Emergency Operations standards: EOP-001-2.1b, EOP-002-3.1 and EOP-003-2.

The Project 2009-03 Emergency Operations Standard Drafting Team (EOP SDT) developed EOP-011-1 by considering the following inputs:

- Applicable FERC directives;
- EOP Five Year Review Team (FYRT) recommendations;
- Independent Expert Review Panel recommendations; and
- Paragraph 81 criteria.

The purpose of EOP-011-1 is to mitigate the effects of operating Emergencies, up to and including manual Load shedding, by implementing Emergency Operating Plans. The standard streamlines the requirements for Emergency Operations for the BES into a clearer and more 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, while ensuring strong communication and coordination across the Functional Entities.

All Elements for Consideration in Development of Emergency Plans from Attachment 1 of EOP-001-2.1b were considered by the EOP SDT and incorporated into the requirements of proposed EOP-011-1.
Questions

1. Based on the EOP FYRT recommendations, the EOP SDT has combined three standards into the proposed EOP-011-1, Emergency Operations. The original standards are EOP-001-2.1b (Emergency Operations Planning), EOP-002-3.1 (Capacity and Energy Emergencies) and EOP-003-2 (Load Shedding Plans). Do you support the consolidation of these standards? If not, please provide specific recommendations for the EOP SDT in your comments.

☐ Yes
☒ No

Comments:

2. The EOP SDT has developed proposed Requirement R1 to specify the minimum set of elements required for the Transmission Operator to include in their Emergency Operating Plan. Do you agree with the proposed requirement? If not, please provide specific suggestions for improvement, including alternate language.

☐ Yes
☒ No

Comments:

3. The EOP SDT has developed proposed Requirement R1, Part 1.2.5 as a process to include manual Load shedding plan coordination. Do you agree that Requirement 1, Part 1.2.5 clearly defines required performance? If not, please provide specific suggestions for improvement, including alternate language.

☐ Yes
☒ No

Comments: We agree with the need to coordinate manual load shedding with other load shedding actions, but Part 1.2.5 falls short of with whom or with which plans a TOP needs to coordinate its manual load shedding plan. We suggest expanding this part as follows:

1.2.5 Manual Load shedding plan coordinated with automatic loading programs to minimize the use of automatic Load shedding, and also coordinated with the manual load shedding plans of other entities in the Reliability Coordinator Area to avoid insufficient or excessive manual load shedding.
4. The EOP SDT has developed proposed EOP-011-1, Requirement R1, Part 1.2.5 without a specific time measure. The currently-enforceable EOP-003-2, Requirement R8 states, “... timeframe adequate for responding to the emergency.” Do you support Requirement R1, Part 1.2.5 without a time measure? If not, please provide specific suggestions for improvement, including alternate language.

☐ Yes
☐ No

Comments: There are other standards with requirements in place to mitigate emergency conditions (e.g. IROL violations) in specific time frames. Imposing another time frame creates the potential for having multiple violations for the same infraction.

We agree with not specifying a time frame since the time required to implement and complete manual load shedding will depend on a number of conditions, such as: the completion of the automatic load shedding and its effects on mitigation, the time needed for manual load shedding to be completed from the time of initiation, other available actions that may be taken prior to shedding load, etc. The reliability driver is to arrest/mitigate Emergency as soon as possible. System Operators will have this reliability driver in mind when faced with an Emergency, and are the best judge to determine when should manual loading be initiated and completed.

5. The EOP SDT developed Requirement R2 to specify the minimum set of elements required for the Balancing Authority to include in their Emergency Operating Plan. Do you agree with the proposed requirement? If not, please provide specific suggestions for improvement, including alternate language.

☐ Yes
☐ No

Comments:
6. The EOP SDT has developed proposed Requirement R2, Part 2.2.8 as a process to include manual Load shedding plan coordination. Do you agree that Requirement R2, Part 2.2.8 clearly defines required performance? If not, please provide specific suggestions for improvement, including alternate language.

☐ Yes  ☒ No

Comments: Same comments as provided in Question 3 for Part 1.2.5 on the need to expand this part to more clearly stipulate who or which plans a BA needs to coordinate its manual load shedding plan with.

7. The EOP SDT has developed proposed Requirement R2, Part 2.2.8 without time measure. The currently-enforce EOP-003-2, Requirement R8 states, “... timeframe adequate for responding to the emergency.” Do you support Requirement R2, Part 2.2.8 without a time measure? If not, please provide specific suggestions for improvement, including alternate language.

☒ Yes  ☐ No

Comments: Same comment as for Part 1.2.5 in the response to Question 4.

8. The EOP SDT has developed a requirement to address a directive from Paragraph 548 of FERC Order No. 693. This directive states “...the Commission finds the reliability coordinator is a necessary entity under EOP-001-0 and directs the ERO to modify the Reliability Standard to include the reliability coordinator as an applicable entity.” Requirement R3 requires the Reliability Coordinator to coordinate the Emergency Operating Plans of the entities in its Reliability Coordinator Area to provide a wide-area perspective and to ensure that they are compatible and support reliability in the Reliability Coordinator Area. This also relates to Requirement R3, Part 3.3 of EOP-001-2.1b, which requires coordination of plans. Do you support the proposed requirement? If not, please provide specific suggestions for improvement, including alternate language.

☐ Yes  ☒ No

Comments: We support the proposed requirement, and we agree with the intent of R3 and R4 (to have Emergency Operating Plans by the TOPs and BAs coordinated, and approved by the RC). However, we believe putting the coordination responsibility solely on the RC (as Requirement R3 suggests) is neither sufficient nor appropriate. The TOPs themselves should be responsible for coordinating their Emergency Operating Plans (EOPs) with other TOPs and BAs in the RC Area.
Likewise, the BAs themselves should be responsible for coordinating their Emergency Operating Plans (EOPs) with other BAs and TOPs in the RC Area. The RC’s role, then, will be to assess if such coordination occurred, and approve or disapprove the EOPs.

We suggest R3 be revised to explicitly state the responsibilities for the TOPs and the BAs (or any other entities within the RC’s Area) to coordinate their EOPs. Alternatively, a new requirement may be created to capture such responsibilities.

9. In addition to Requirement R3, the EOP SDT proposes an additional requirement, Requirement R4, applicable to the Reliability Coordinator to address the Order No. 693, Paragraph 548 directive. The proposed Requirement R4 requires the Reliability Coordinator to approve or disapprove Transmission Operator and Balancing Authority Emergency Operating Plans within 30 days of submittal. Since these Emergency Operating Plans are submitted on an agreed-upon schedule, the EOP SDT believes that 30 days is adequate time for the Reliability Coordinator to assess the plans. Do you support the proposed changes? If not, please provide specific suggestions for improvement, including alternate language.

☐ Yes
☒ No

Comments: It is not clear what an entity should do if its plan is not approved, especially if an entity is revising its plan to address a known deficiency or required changes to its existing plan. In this circumstance simply using the existing plan does not seem appropriate.

We agree with the proposed R4, on the assumption that coordination between TOPs/BAs have occurred prior to the submittal of the individual EOPs. Please refer to our comments to Question 8.

10. The EOP SDT has developed proposed Requirement R5 to have a Transmission Operator that is experiencing an operating Emergency to communicate its Emergency, current and projected system conditions to its Reliability Coordinator. This is a corollary requirement to existing EOP-002-3.1, Requirement R3; whereby the Balancing Authority performs a similar notification for its Emergencies. Do you support the proposed Requirement R5? If not, please provide specific suggestions for improvement, including alternate language.

☒ Yes
☐ No

Comments:
We support the addition of R5 to have a Transmission Operator that is experiencing an operating Emergency to communicate its Emergency, current and projected system conditions to its Reliability Coordinator. (Clarification is needed for “projected system conditions.” A definition of this term would help clarify the intent of this statement so that it would not be open ended.) A responsible entity must communicate this to other TOPs and/or BAs that may be impacted by the TOP’s Emergency. How quickly does a TOP that is experiencing an operating Emergency have to “communicate the Emergency and its current and projected System conditions to its Reliability Coordinator”?

11. The EOP SDT has developed proposed Requirement R6 to have a Balancing Authority that is experiencing a capacity or Energy Emergency to communicate its Emergency, current and projected system conditions to its Reliability Coordinator. This is a revision to existing EOP-002-3.1, Requirement R3. Do you support the proposed requirement? If not, please provide specific suggestions for improvement, including alternate language.

☐ Yes  ☐ No

Comments:
We are indifferent as to who should be responsible for communicating this to other TOPs and/or BAs that may be impacted by the TOP’s Emergency, as long as this is performed by a responsible entity.

12. The EOP SDT has developed proposed Requirement R7 to have a Reliability Coordinator that receives an Emergency notification from a Balancing Authority or Transmission Operator to notify, as soon as practicable, impacted Reliability Coordinators, Balancing Authorities and Transmission Operators. This is a revision to existing EOP-002-3.1, Requirement R3. Do you support the proposed requirement? If not, please provide specific suggestions for improvement, including alternate language.

☐ Yes  ☒ No

Comments: There should be a maximum time by which the RC must notify impacted parties; it cannot be left stated “as soon as practicable”.
Holding the RC responsible for this communication can be more streamlined and coordinated, but it adds time to completion of the communication. Holding the individual entities whose area is experiencing an Emergency responsible for such notifications can speed up information dissemination, but may cause confusion. It must considered that an individual entity’s top priority should be to resolve the Emergency.

13. The EOP SDT has revised EOP-002-3.1, Requirement R6, Part 6.5 and Requirement R7, Part 7.2 and included it in EOP-011-1 as Requirement R8. Do you support the proposed requirement? If not, please provide specific suggestions for improvement, including alternate language.

☐ Yes
☐ No

Comments:

14. The EOP SDT has revised EOP-002-3.1, Requirement R8 and included it in EOP-011-1 as Requirement R9. Do you support the proposed requirement? If not, please provide specific suggestions for improvement, including alternate language.

☐ Yes
☐ No

Comments:

15. The EOP SDT has revised Attachment 1 of EOP-002-3.1. Do you support the proposed revisions to Attachment 1? If not, please provide specific suggestions for improvement.

☐ Yes
☒ No

Comments: While the initial Attachment 1 is largely intact, we notice that the notification details under an Alert 2 have been removed. The mapping document does not provide the rationale for the removal, nor is it presented in any of the technical justification document. We see the need for having such details in the revised Attachment 1, but are not provided the basis of the removal to aid an assessment. Please provide the rationale.
16. The EOP SDT has considered technical justification to remove Attachment 1 from the proposed EOP-011-1. If Attachment 1 were to be removed, the SDT proposes that NERC’s Energy Emergency Alert levels be incorporated into the NERC Glossary as defined terms, with some of the additional information in Attachment 1 incorporated as a guidance document. Would you support this approach? If not, please provide specific suggestions for an alternate approach that you would support.

☐ Yes
☒ No

Comments: Both the proposed and current approaches are acceptable.

We can support defining the EEA levels through a definition, and incorporate them into the NERC Glossary. However, Attachment 1 also serves the purpose of providing necessary information associated with and required for issuing EEAs. To put some of that into the Glossary of Terms, will make the defined term very lengthy. Putting other information into a guideline document is only possible if none of the required information depicted in Attachment 1 is mandatory. Unfortunately, we are unable to locate the detailed technical justification the EOP SDT used to support the proposed removal of all information in Attachment 1 that are “requirements”. Please provide them at the next posting so that we can assess the merit of this proposal. A mapping of the detailed information in Attachment 1 after the proposed removal will be very helpful.

The following should be added to the Glossary of Terms as defined terms:
“Energy Emergency Alert”
“Energy Deficient Entity”

Additional comment on Attachment 1, Alert 3 and Alert 0: Shouldn’t the words here match the words used in the revised definition of “Energy Emergency” so as to say “is no longer able to meet Load?” (same as under “Alert 0”)?

17. Do you have any other comments regarding proposed EOP-011-1, not included above, that you would like to provide to the EOP SDT? If so, please provide specific comments for improvement.

☐ Yes
☐ No

Comments: In the section of the standard entitled “Definitions of Terms Used in Standard”, the SDT has defined Energy Emergency as: “Energy Emergency – a Condition when a Load-Serving Entity or
Balancing Authority has exhausted all other options and can no longer provide expected Load requirements”. This is a revision of the definition in the NERC Glossary is unclear because it does not define the point at which the Load-Serving Entity or Balancing Authority should decide that they can no longer provide expected Load requirements. Is that when it can no longer provide all necessary Load requirements? Or is it intended to mean that a significant portion of the Load requirements can no longer be provided – and if so, what constitutes a significant portion? More clarity is needed in the standard. Suggest revising the definition by changing “provide” to “meet” and delete “requirements”. The proposed definition would then read “...can no longer meet its expected Load.“Even if it is preferable to not define the specific point in the standard, the standard should state that the Energy Emergency condition will be defined and documented by the Balancing Authority or the Load Serving Entity.

Comments on BAL-002-WECC-2 – Contingency Reserve: We are unclear on the inclusion of “BAL-002-WECC-2 – Contingency Reserve” and Requirement R1 on P. 3, Definitions of Terms Used in Standard. Please clarify. Also, “energy emergency” is not capitalized in one of the R1.1 bullets here – it should be because it is a defined term.

“Emergency Operating Plan” is capitalized but it is not a defined term in the Glossary of Terms and there is no definition included in this draft of the standard. A definition should be added or it should not be capitalized.

Comment on R1 and R5: the standards talk about “operating Emergencies.” There are definitions for “Energy Emergency,” “Capacity Emergency,” and “Emergency” (or “BES Emergency”). If the definition of “Emergency” captures what is needed, then the word “operating” isn’t needed and should be deleted. The phrase “operating Emergency” also appears in R5.

Comment on R2, R6, and R8: Energy Emergency has a definition in the draft – but what constitutes a “capacity” is not capitalized in “capacity Emergency.” The definition of “Capacity Emergency” in the Glossary is “[a] capacity emergency exists when a Balancing Authority Area’s operating capacity, plus firm purchases from other systems, to the extent available or limited by transfer capability, is inadequate to meet its demand plus its regulating requirements.” So, if this is what the standard means by “capacity Emergency,” then it should be capitalized. R2 should read: “to mitigate Capacity Emergencies and Energy Emergencies.” Same comment applies to R6 and R8.