

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. Bullets, numbers, and special formatting will not be retained.

1. The EOP PRT's initial recommendation outlines several clarifying revisions to EOP-005-2. 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--The Drafting Team should not only consider clarifying the 90 calendar days, but should also consider revising Requirement R4 to eliminate the "unplanned" and "planned" wording. A suggested revision:

...after identifying any BES physical or operating modification that would change the implementation of its restoration plan.

The Drafting Team should consider developing a formal definition for restoration plan for inclusion in the NERC Glossary.

Item b.--Agree.

Item c.--Agree.

Item d.--Agree.

Item e.--Agree. In the proposed Rationale Box, it should be explained that dynamic simulations should be done for System changes within a specified time frame. This may require the addition of a Part to requirement R6, or a revision to requirement R4.

Item f.--Agree.

Item g.--Agree.

Item h.--Agree.

Item i.--Agree.

Item j.--Agree.

2. The EOP PRT is proposing one (1) retirement of Requirement R10 in EOP-005-2. Do you agree with the EOP PRT's recommendations? If not, please explain.

Yes

No

Comments:

3. The EOP PRT is proposing *not* to retire three (3) requirements in EOP-005-2 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: Recommend that Requirements R7 and R8 be incorporated into Requirement R1. Agree that 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. Requirement R1 should be revised as follows:

- The first sentence in Requirement R1 should be revised to state: "Each Transmission Operator shall develop, maintain and implement a restoration plan that is approved by its Reliability Coordinator."
- Part R1.3 should be revised to state: "Procedures for restoring interconnections with other Transmission Operators with authorization from and under the direction of the Reliability Coordinator."
- A new part should be added to R1 (best placed as Part R1.9, with the currently effective Part R1.9 renumbered to become Part 1.10). The new part should state: "Restoration strategies to facilitate restoration if the restoration plan cannot be executed as expected."

4. Do you agree with the initial recommendation of the EOP PRT regarding EOP-005-2? If not, please explain specifically what aspects of the recommendation you disagree with.

Yes

No

Comments: (i) Please see comments in the response to Question 3 regarding the retirement of Requirements R7 and R8, and incorporation of their language into Requirement R1. Once this is done, the EOP PRT's recommendations under 2.f. and 2.g. become moot.

(ii) The terms "plans" and "procedures" are appropriately used throughout the standard and, therefore, no revisions to those terms are needed.

(ii) The second sentence in the EOP PRT's recommendation under 2.e. should be revised to conform to the first sentence, by adding the word "clarified:" "In addition, the EOP PRT recommends that the future SDT verify that the RSAW is appropriate to capture the clarified intent of the requirement."

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-005-2.

Comments: Support the EOP PRT's recommendation that the future SDT review and address industry confusion regarding the application of "unique tasks." However, clarification is needed (examples should be provided). Without clarification, "unique tasks" could be interpreted differently throughout the industry.

This standard puts a lot of emphasis on Blackstart Resources but there are no requirements for other critical components such as synchronizing devices. For example:

- Identify the synchronization points used for system restoration
- Require a fully operational synchronization device for each synchronization point
- Require regular maintenance of the synchronization devices
- Require synchronization drills or exercises

R1: There is no reference to the formation of an island on the BES in the context of the TOP restoration plan which seems to be inconsistent with R1 of EOP-006-2.

R1.4: There are no clearly defined criteria for the identification of Black Start Resources. In the Directory D8 from NPCC (NPCC D8), a Blackstart Resource is used to restore a clearly identified "minimum basic power system". In this standard the resource must just be part of the TOP restoration plan (NERC definition).

R1.4: The term "megavar capacity" is not defined.

R6.1: The term “dynamic capability” is not defined. Active and Reactive power maximum capability has been used elsewhere.

R7 and R8: The implementation of the TOP restoration plan is based on the use of Blackstart Resources to initiate the restoration, and there is no reference to the formation of an island on the BES (R1 of EOP-006-2) for invoking the TOP restoration plan.

R11: The term “field switching personnel” needs to be clarified. Most switching operations are currently performed by remote control (e.g. a TO control center) so “field” can refer to personnel in a “lower level” remote control facility and not uniquely a roving operator in the field or an operator manning an installation.

There seems to be a consensus regarding the “unique tasks” (e.g, synchronization of islands, emergency switching operations such as “open all breakers”) so it would be appropriate to define these unique tasks or list typical examples.