
**BEFORE THE
NATIONAL ENERGY BOARD**

**NORTH AMERICAN ELECTRIC)
RELIABILITY CORPORATION)**

**NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION
PETITION FOR APPROVAL OF ERRATA CHANGES TO SEVEN RELIABILITY
STANDARDS**

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II. BACKGROUND

Each of the proposed standards set forth in **Attachment A** was initially developed and approved by industry stakeholders using NERC's Reliability Standards Development Procedure. Since that time, NERC has identified several ministerial corrections and/or clarifications that are needed.

The NERC Standards Committee developed and approved a process to administer the processing of errata changes to NERC standards that is outlined on page 40 of the Standard Processes Manual. Where the "correction of an error does not change the scope or intent of the associated standard, and [the Standards Committee] agrees that the correction has no material impact on the end users of the standard, then the correction shall be submitted for information to the NERC Board of Trustees and filed for approval with applicable government authorities."² The Standards Committee has reviewed the instant proposed errata changes and has found that they do not change the scope or intent of the associated standards, nor do they have a material

² See p. 40 of the Standard Process Manual, available here:
http://www.nerc.com/files/Appendix_3A_Standard_Processes_Manual_20110825.pdf.

impact on the end users of the standards.³ Upon approval, these standards will supersede the existing versions of the standards.

III. PROPOSED ERRATA CHANGES

A. BAL-005-0.1b: Automatic Generation Control

On May 5, 2009, NERC submitted an interpretation of Requirement R17 of BAL-005 regarding the type and location of the equipment to which Requirement R17 applies.

In the instant filing, NERC has replaced Appendix 1 of the BAL-005 standard with the correct version of the interpretation and has made an internal reference correction in the interpretation; changing “BAL-005-1” to “BAL-005-0.” As a result of these changes, this standard will be numbered “BAL-005-0.2b” on a going-forward basis. NERC has also updated the version history table to reflect these revisions and to incorporate additional information regarding the adoption of Version 0 of this standard.

B. EOP-001-0b and EOP-001-22b: Emergency Operations Planning

On April 3, 2006, NERC filed 107 Reliability Standards, including the Emergency Operations and Preparedness (“EOP”) Reliability Standard, EOP-001-0. On January 21, 2010, NERC filed EOP-001-1. On the same day, NERC also filed version 2 of EOP-001 as part of its filing of IRO-008-1, IRO-009-1, and IRO-010-1a. Each NERC filing proposed unique changes to EOP-001-0 not reflected in the other filing, presenting a logistical problem with cross-references.

On September 26, 2011, NERC submitted an interpretation of Requirements R1 and R3.2 of Reliability Standard EOP-001-0 and Requirements R1 and R2.2 to EOP-001-2. EOP-001-0 is

³ The errata included herein were approved by the Standards Committee on March 8, 2012 and April 11, 2012. See http://www.nerc.com/docs/standards/sc/sc_20120411a_package_final.pdf.

the currently effective Reliability Standard and EOP-001-2 becomes effective on July 1, 2013. For this reason, NERC is proposing errata to both versions of this standard as described below.

1. EOP-001-0b: Emergency Operations Planning

NERC has updated the title of Attachment 1 and corrected internal references throughout the standard by changing “Attachment EOP-001-0b” to “Attachment EOP-001.” In addition, an incorrect internal reference in Appendix 2 of Reliability Standard EOP-001-0b has been changed from “R2.2” to “R3.2.” As a result of these changes, the number of this standard will be “EOP-001-0.1b” on a going-forward basis. NERC has also updated the version history table to reflect these revisions.

2. EOP-001-2b: Emergency Operations Planning

NERC has updated the title of Attachment 1 and corrected internal references throughout the standard by changing “Attachment EOP-001-0b” to “Attachment EOP-001.” NERC has also updated references in Appendix 1 from “EOP-001-0” to “EOP-001-2.” As a result of these changes, the number of this standard will be “EOP-001-2.1b” on a going-forward basis. NERC has also updated the version history table to reflect these revisions.

C. EOP-002-3: Capacity and Energy Emergencies

NERC has updated the title of Attachment 1 and corrected internal references to Attachment 1 throughout the standard from “Attachment 1-EOP-002-0 Energy Emergency Alert Levels” to “Attachment 1-EOP-002 Energy Emergency Alerts.” NERC has removed the parenthetical in Requirement R9 that references a retired Attachment in IRO-006. As a result of these changes, this standard will be numbered “EOP-002-3.1” on a going-forward basis. NERC has also updated the version history table to reflect these revisions.

D. IRO-005-3a: Reliability Coordination – Current Day Operations

NERC has removed outdated internal references in Measures M10 and M11 to “Part 2” of Requirements R10 and R11, as no such Parts currently exist. As a result of these changes, this standard will be numbered “IRO-005-3.1a” on a going-forward basis. NERC has also updated the version history table to reflect these revisions and to add clarifying language regarding Versions 2a and 3a of this standard.

E. PER-001-0.1: Operating Personnel Responsibility and Authority

NERC has made a minor clarifying correction to the language in Measure M1.4 by changing the placement of the word “Interconnection.” Measure M1.4 currently states: “Such actions shall include shedding of firm load to prevent or alleviate System Operating Limit Interconnection or Reliability Operating Limit violations.” NERC’s proposed errata clarifies that the correct term intended to apply in this Measure is “Interconnection Reliability Operating Limit,” which is a defined term in the NERC Glossary of Terms Used in Reliability Standards.⁴ As a result of this change, this standard will be numbered “PER-001-0.2” on a going-forward basis. NERC has also updated the version history table to reflect this revision.

F. TOP-002-2b: Normal Operations Planning

On June 8, 2011, NERC submitted a Petition for Approval of an Interpretation to Requirement R10 of Reliability Standard TOP-002-2a— Normal Operations Planning. It has come to NERC’s attention that on page 1 of Reliability Standard TOP-002-2b included in Exhibit B of the original filing, the following language in the Effective Date section should be omitted, “FERC Approved 12/2/09.” In addition, Requirement R14 contains two sub-requirements (R.14.1 and R.14.2), that are no longer effective as they were retired, as stated

⁴ Available here: http://www.nerc.com/files/Glossary_of_Terms.pdf.

therein, on August 1, 2007. NERC has removed these sub-requirements, and also removed the following outdated parenthetical from R.14.1, “(Effective August 1, 2007).”

NERC has also updated Measure M7 to reflect these changes to Requirement R14. The modified Measure M7 states: “Each Generator Operator shall have and provide upon request evidence that could include, but is not limited to, voice recordings or transcripts of voice recordings, electronic communications, or other equivalent evidence that will be used to confirm that without any intentional time delay, it notified its Balancing Authority and Transmission Operator of changes in real output capabilities. (Requirement 14)”

As a result of these changes, this standard will be numbered “TOP-002-2.1b” on a going-forward basis. NERC has also updated the version history table to reflect these revisions.

IV. ATTACHMENTS

NERC’s petition consists of the following documents in addition to the instant transmittal letter:

Attachment A Clean Versions of the Proposed Errata to Reliability Standards, including:

- BAL-005-0.2b: Automatic Generation Control
- EOP-001-0.1b: Emergency Operations Planning
- EOP-001-2.1b: Emergency Operations Planning
- EOP-002-3.1: Capacity and Energy Emergencies
- IRO-005-3.1a: Reliability Coordination – Current Day Operations
- PER-001-0.2: Operating Personnel Responsibility and Authority
- TOP-002-2b: Normal Operations Planning

Attachment B Redlined Versions of Proposed Errata to Reliability Standards

V. CONCLUSION

The North American Electric Reliability Corporation respectfully requests approval of errata revisions to seven Reliability Standards contained in this filing.

Respectfully submitted,

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ATTACHMENTS A – B

(Available on the NERC Website at
http://www.nerc.com/fileUploads/File/Filings/Attachments_Errata.2012.6.5)