NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

April 18, 2011

VIA ELECTRONIC FILING

Ms. Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, D.C. 20426

Re: *System Restoration Reliability Standards*, Docket No. *RM10-16-000*

Dear Ms. Bose:

The North American Electric Reliability Corporation ("NERC") hereby submits this Request for Clarification of Order No. 749 Regarding System Restoration Reliability Standards.[1] NERC is concurrently filing a request for clarification of Order No. 748 Regarding Mandatory Reliability Standards for Interconnection Reliability Operating Limits[2] because the same issue regarding the effective version and effective date of the EOP-001 standard was raised in both Order Nos. 748 and 749.

Please contact the undersigned if you have any questions.

/s/ Holly A. Hawkins
Holly A. Hawkins
Attorney for North American Electric Reliability Corporation

[1] *System Restoration Reliability Standards*, 134 FERC ¶ 61,215 (March 17, 2011) (Order No. 749).
[2] *Mandatory Reliability Standards for Interconnection Reliability Operating Limits*, 134 FERC ¶ 61,213 (March 17, 2011) (Order No. 748).

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UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

System Restoration Reliability Standards	**)**	**Docket No. RM10-16-000**
	)	

REQUEST OF THE NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION FOR CLARIFICATION OF ORDER No. 749 REGARDING SYSTEM RESTORATION RELIABILITY STANDARDS

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April 18, 2011

I. INTRODUCTION

Pursuant to Rule 212[1] of the Federal Energy Regulatory Commission's ("FERC" or the "Commission") Rules of Practice and Procedure, 18 C.F.R. §§ 385.212, the North American Electric Reliability Corporation ("NERC") requests clarification of the Commission's March 17, 2011 Order No. 749 ("Order No. 749").[2] The Commission's Order No. 749: (i) approved three Emergency Operations and Preparedness ("EOP") Reliability Standards (EOP-001-1 — Emergency Operations Planning, EOP-005-2 — System Restoration from Blackstart Resources, and EOP-006-2 — System Restoration Coordination) as well as the definition of the term "Blackstart Resource"; and (ii) approved NERC's proposal to retire four existing EOP Reliability Standards and an earlier definition of Blackstart Resource.

By this filing, NERC requests clarification with respect to two key elements of Order No. 749.

[1] 18 CFR § 385.212 (2008).
[2] *System Restoration Reliability Standards*, 134 FERC ¶ 61,215 (March 17, 2011) (Order No. 749).

II. NOTICES AND COMMUNICATIONS

Notices and communications with respect to this filing may be addressed to the following:

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*Persons to be included on FERC's service list are indicated with an asterisk. NERC requests waiver of FERC's rules and regulations to permit the inclusion of more than two people on the service list.

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III. STATEMENT OF ISSUES FOR CLARIFICATION

Pursuant to 18 C.F.R. § 385.212, NERC seeks clarification on two issues in Order No. 749:

1) NERC is seeking clarification regarding the Commission's approval of the EOP-001-1 standard in Paragraphs 1, 4, and 17 of the order. NERC requested in its petition[3] that the Commission approve EOP-001-1 only if the concurrent filing (requesting approval of three new Interconnection Reliability Operations and Coordination Reliability Standards and seven revised Reliability Standards related to Emergency Preparedness and Operations, Interconnection Reliability Operations and Coordination, and Transmission Operations[4]) was not previously (or concurrently) approved by the Commission. However, if the requests detailed in the two petitions submitted to FERC on December 31, 2009 were approved, as they were on March 17, 2011, then NERC requested that the Commission approve EOP-001-2 rather than EOP-001-1. Because the Commission approved both the IROL Petition and the

[3] *See, Petition of the North American Electric Reliability Corporation for Approval of Three Emergency Preparedness and Operations Reliability Standards and One New Glossary Term and for Retirement of Five Existing Reliability Standards and One Glossary Term,* FERC Docket Nos. RM06-16-000, RM10-16-000 (December 31, 2009) ("EOP Petition").

[4] *See, Petition of the North American Electric Reliability Corporation for Approval of Proposed New and Revised Reliability Standards for Operating Within Interconnection Operating Limits,* FERC Docket Nos. RM06-16-000, RM10-15-000 (December 31, 2009)("IROL Petition").

EOP Petition concurrently, NERC is requesting clarification that the EOP-001 Version 2 standard, rather than the EOP-001 Version 1 standard, be approved.

2) NERC is seeking clarification regarding the effective date of the EOP-001-2 Reliability Standard. In its petition, NERC requested EOP-001-1 to become effective "the first day of the first calendar quarter, three months after applicable regulatory approval." However, NERC requested that if EOP-001-2 were to be approved, it should be made effective "twenty-four months after the first day of the first calendar quarter following applicable regulatory approval." NERC therefore seeks clarification that the EOP-001-2 Reliability Standard and the effective date provision included in that standard be approved.

IV. DISCUSSION OF ISSUES ADDRESSED BY THE REQUEST FOR CLARIFICATION

NERC is requesting clarification regarding the Commission's approval of the EOP-001-1 Reliability Standard. In its petition, NERC requested that the Commission approve EOP-001-1 only if the concurrent IROL Petition is not previously (or concurrently) approved by the Commission. However, if the requests detailed in the two petitions submitted to FERC on December 31, 2009 are approved, as they were on March 17, 2011, then NERC requested that the Commission approve EOP-001-2 rather than EOP-001-1. The proposed EOP-001-2 standard is included as **Attachment A** to this filing.

NERC included the EOP-001-1 standard in the EOP petition, but only requested Commission approval of EOP-001-1 in the event that the Commission not approve the contemporaneously filed Interconnection Reliability Operations and Coordination Reliability Standards ("IROL standards") in the IROL Petition. However, because the Commission concurrently approved both of NERC's petitions containing the IROL standards and the EOP standards, the correct version of the standard that should have been approved is EOP-001-2 because EOP-001-2 includes conforming changes necessary for implementation of both the IROL and EOP standards. It is unclear from FERC's Orders on March 17, 2011 that this is the

case. The Commission repeatedly states throughout Order No. 749 that EOP-001-1 is approved.[5] However, the Commission also notes in Footnote 13 of Order No. 749 that: "[i]n this Final Rule, the Commission is addressing Version 2 of EOP-001 contained in Exhibit B of the NERC Petition which reflects both the IRO and the EOP proposed changes."[6]

In the EOP Petition submitted to FERC on December 31, 2009, NERC stated:

> NERC recognizes that revised standard EOP-001 is included for approval in this filing as well as in the Operate within Interconnection Reliability Operating Limits (IRO) filing being filed contemporaneously. The modifications proposed for the EOP-001 standard in this filing and in the IRO filing include changes unique to each project. NERC cannot anticipate the outcome or sequence in which FERC will act on these filings. Therefore, NERC includes in Exhibit A a proposed Version 1 of EOP-001 that contains only the changes developed by the System Restoration and Blackstart project. In the event FERC acts on the System Restoration and Blackstart filing before the IRO filing or if the IRO filing is remanded before the System Restoration and Blackstart filing is acted upon, then Exhibit A Version 1 will be the appropriate standard to approve. In the event FERC approves the IRO filing first, NERC also includes in Exhibit B Version 2 of EOP-001 that contains both the IRO team directed changes and those proposed in this filing. Because EOP-001-0 is the currently-approved standard in effect, the changes proposed in this filing are applied against this Version 0. Should the IRO filing be affirmatively acted upon first, NERC modifies its requests for FERC approval of EOP-001-2 as provided in Exhibit B. Accordingly, for the reasons stated above, NERC requests FERC to clarify that EOP-001-2 is approved, and that Version 1 of EOP-001 included in the EOP Petition will not become effective.

Accordingly, for the reasons stated above, NERC requests FERC to clarify that EOP-001-2 is approved, and that Version 1 of EOP-001 included in the EOP Petition will not become effective.

The third issue requiring clarification involves the effective date for the EOP-001-2 standard. In its filings, NERC requested that EOP-001-1 become effective "the first day of the first calendar quarter, three months after applicable regulatory approval." However, NERC requested that if EOP-001-2 were to be approved, it should be made effective "twenty-four

[5] *See, Paragraphs 1, 4, and 17 of Order No. 749.*
[6] Order No. 749, Footnote 13, *See also Mandatory Reliability Standards for Interconnection Reliability Operating Limits*, 134 FERC ¶ 61,213 (March 17, 2011) (Order No. 748) at Footnote 15.

months after the first day of the first calendar quarter following applicable regulatory approval." The effective date language in the EOP-001-2 standard is necessary to coincide with the Commission's approval of the effective date provisions in the EOP standards and the IROL standards. NERC therefore seeks clarification that Version 2 of the EOP-001 standard and its proposed effective date be made effective in accordance with FERC's Order No. 749.

V. CONCLUSION

For the reasons set forth in this filing, NERC requests that FERC issue an Order granting the Request for Clarification as set forth above.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing document upon all parties listed on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, D.C. this 18th day of April, 2011.

/s/Andrew M. Dressel
Andrew M. Dressel
Attorney for North American Electric Reliability Corporation

Exhibit A

Proposed Reliability Standard EOP-001-2

A. Introduction

1. **Title:** **Emergency Operations Planning**

2. **Number:** EOP-001-2

3. **Purpose:** Each Transmission Operator and Balancing Authority needs to develop, maintain, and implement a set of plans to mitigate operating emergencies. These plans need to be coordinated with other Transmission Operators and Balancing Authorities, and the Reliability Coordinator.

4. **Applicability**

   4.1. Balancing Authorities.

   4.2. Transmission Operators.

5. **Proposed Effective Date:** Twenty-four months after the first day of the first calendar quarter following applicable regulatory approval. In those jurisdictions where no regulatory approval is required, all requirements go into effect twenty-four months after Board of Trustees adoption.

B. Requirements

R1. Balancing Authorities shall have operating agreements with adjacent Balancing Authorities that shall, at a minimum, contain provisions for emergency assistance, including provisions to obtain emergency assistance from remote Balancing Authorities.

R2. Each Transmission Operator and Balancing Authority shall:

R2.1. Develop, maintain, and implement a set of plans to mitigate operating emergencies for insufficient generating capacity.

R2.2. Develop, maintain, and implement a set of plans to mitigate operating emergencies on the transmission system.

R2.3. Develop, maintain, and implement a set of plans for load shedding.

R3. Each Transmission Operator and Balancing Authority shall have emergency plans that will enable it to mitigate operating emergencies. At a minimum, Transmission Operator and Balancing Authority emergency plans shall include:

R3.1. Communications protocols to be used during emergencies.

R3.2. A list of controlling actions to resolve the emergency. Load reduction, in sufficient quantity to resolve the emergency within NERC-established timelines, shall be one of the controlling actions.

R3.3. The tasks to be coordinated with and among adjacent Transmission Operators and Balancing Authorities.

R3.4. Staffing levels for the emergency.

R4. Each Transmission Operator and Balancing Authority shall include the applicable elements in Attachment 1-EOP-001-0 when developing an emergency plan.

R5. The Transmission Operator and Balancing Authority shall annually review and update each emergency plan. The Transmission Operator and Balancing Authority shall provide a copy of its updated emergency plans to its Reliability Coordinator and to neighboring Transmission Operators and Balancing Authorities.

R6. The Transmission Operator and Balancing Authority shall coordinate its emergency plans with other Transmission Operators and Balancing Authorities as appropriate. This coordination includes the following steps, as applicable:

R6.1. The Transmission Operator and Balancing Authority shall establish and maintain reliable communications between interconnected systems.

R6.2. The Transmission Operator and Balancing Authority shall arrange new interchange agreements to provide for emergency capacity or energy transfers if existing agreements cannot be used.

R6.3. The Transmission Operator and Balancing Authority shall coordinate transmission and generator maintenance schedules to maximize capacity or conserve the fuel in short supply. (This includes water for hydro generators.)

R6.4. The Transmission Operator and Balancing Authority shall arrange deliveries of electrical energy or fuel from remote systems through normal operating channels.

C. Measures

M1. The Transmission Operator and Balancing Authority shall have its emergency plans available for review by the Regional Reliability Organization at all times.

M2. The Transmission Operator and Balancing Authority shall have its two most recent annual self-assessments available for review by the Regional Reliability Organization at all times.

D. Compliance

1. Compliance Monitoring Process

1.1. Compliance Monitoring Responsibility

Regional Reliability Organization.

1.2. Compliance Monitoring Period and Reset Time Frame

The Regional Reliability Organization shall review and evaluate emergency plans every three years to ensure that the plans consider the applicable elements of Attachment 1-EOP-001-0.

The Regional Reliability Organization may elect to request self-certification of the Transmission Operator and Balancing Authority in years that the full review is not done.

Reset: one calendar year.

1.3. Data Retention

Current plan available at all times.

1.4. Additional Compliance Information

Not specified.

2. Violation Severity Levels:

Requirement	Lower	Moderate	High	Severe
R1	The Balancing Authority failed to demonstrate the existence of the necessary operating agreements for less than 25% of the adjacent BAs. Or less than 25% of those agreements do not contain provisions for emergency assistance.	The Balancing Authority failed to demonstrate the existence of the necessary operating agreements for 25% to 50% of the adjacent BAs. Or 25 to 50% of those agreements do not contain provisions for emergency assistance.	The Balancing Authority failed to demonstrate the existence of the necessary operating agreements for 50% to 75% of the adjacent BAs. Or 50% to 75% of those agreements do not contain provisions for emergency assistance.	The Balancing Authority failed to demonstrate the existence of the necessary operating agreements for 75% or more of the adjacent BAs. Or more than 75% of those agreements do not contain provisions for emergency assistance.
R2	The Transmission Operator or Balancing Authority failed to comply with one (1) of the sub-components.	The Transmission Operator or Balancing Authority failed to comply with two (2) of the sub-components.	N/A	The Transmission Operator or Balancing Authority has failed to comply with three (3) of the sub-components.
R2.1	The Transmission Operator or Balancing Authority's emergency plans to mitigate insufficient generating capacity are missing minor details or minor program/procedural elements.	The Transmission Operator or Balancing Authority's has demonstrated the existence of emergency plans to mitigate insufficient generating capacity emergency plans but the plans are not maintained.	The Transmission Operator or Balancing Authority's emergency plans to mitigate insufficient generating capacity emergency plans are neither maintained nor implemented.	The Transmission Operator or Balancing Authority has failed to develop emergency mitigation plans for insufficient generating capacity.
R2.2	The Transmission Operator or Balancing Authority's plans to mitigate transmission system emergencies are missing minor details or minor program/procedural elements.	The Transmission Operator or Balancing Authority's has demonstrated the existence of transmission system emergency plans but are not maintained.	The Transmission Operator or Balancing Authority's transmission system emergency plans are neither maintained nor implemented.	The Transmission Operator or Balancing Authority has failed to develop, maintain, and implement operating emergency mitigation plans for emergencies on the transmission system.

Requirement	Lower	Moderate	High	Severe
R2.3	The Transmission Operator or Balancing Authority's load shedding plans are missing minor details or minor program/procedural elements.	The Transmission Operator or Balancing Authority's has demonstrated the existence of load shedding plans but are not maintained.	The Transmission Operator or Balancing Authority's load shedding plans are partially compliant with the requirement but are neither maintained nor implemented.	The Transmission Operator or Balancing Authority has failed to develop, maintain, and implement load shedding plans.
R3	The Transmission Operator or Balancing Authority failed to comply with one (1) of the sub-components.	The Transmission Operator or Balancing Authority failed to comply with two (2) of the sub-components.	The Transmission Operator or Balancing Authority has failed to comply with three (3) of the sub-components.	The Transmission Operator or Balancing Authority has failed to comply with all four (4) of the sub-components.
R3.1	The Transmission Operator or Balancing Authority's communication protocols included in the emergency plan are missing minor program/procedural elements.	N/A	N/A	The Transmission Operator or Balancing Authority has failed to include communication protocols in its emergency plans to mitigate operating emergencies.
R3.2	The Transmission Operator or Balancing Authority's list of controlling actions has resulted in meeting the intent of the requirement but is missing minor program/procedural elements.	N/A	The Transmission Operator or Balancing Authority provided a list of controlling actions, however the actions fail to resolve the emergency within NERC-established timelines.	The Transmission Operator or Balancing Authority has failed to provide a list of controlling actions to resolve the emergency.

Requirement	Lower	Moderate	High	Severe
R3.3	The Transmission Operator or Balancing Authority has demonstrated coordination with Transmission Operators and Balancing Authorities but is missing minor program/procedural elements.	N/A	N/A	The Transmission Operator or Balancing Authority has failed to demonstrate the tasks to be coordinated with adjacent Transmission Operator and Balancing Authorities as directed by the requirement.
R3.4	The Transmission Operator or Balancing Authority's emergency plan does not include staffing levels for the emergency	N/A	N/A	N/A
R4	The Transmission Operator and Balancing Authority's emergency plan has complied with 90% or more of the number of sub-components.	The Transmission Operator and Balancing Authority's emergency plan has complied with 70% to 90% of the number of sub-components.	The Transmission Operator and Balancing Authority's emergency plan has complied with between 50% to 70% of the number of sub-components.	The Transmission Operator and Balancing Authority's emergency plan has complied with 50% or less of the number of sub-components
R5	The Transmission Operator and Balancing Authority is missing minor program/procedural elements.	The Transmission Operator and Balancing Authority has failed to annually review one of it's emergency plans	The Transmission Operator and Balancing Authority has failed to annually review two of its emergency plans or communicate with one of it's neighboring Balancing Authorities.	The Transmission Operator and Balancing Authority has failed to annually review and/or communicate any emergency plans with its Reliability Coordinator, neighboring Transmission Operators or Balancing Authorities.
R6	The Transmission Operator and/or the Balancing Authority failed to comply with one (1) of the sub-components.	The Transmission Operator and/or the Balancing Authority failed to comply with two (2) of the sub-components.	The Transmission Operator and/or the Balancing Authority has failed to comply with three (3) of the sub-components.	The Transmission Operator and/or the Balancing Authority has failed to comply with four (4) or more of the sub-components.

Requirement	Lower	Moderate	High	Severe
R6.1	The Transmission Operator or Balancing Authority has failed to establish and maintain reliable communication between interconnected systems.	N/A	N/A	N/A
R6.2	The Transmission Operator or Balancing Authority has failed to arrange new interchange agreements to provide for emergency capacity or energy transfers with required entities when existing agreements could not be used.	N/A	N/A	N/A
R6.3	The Transmission Operator or Balancing Authority has failed to coordinate transmission and generator maintenance schedules to maximize capacity or conserve fuel in short supply.	N/A	N/A	N/A
R6.4	The Transmission Operator or Balancing Authority has failed to arrange for deliveries of electrical energy or fuel from remote systems through normal operating channels.	N/A	N/A	N/A

E. Regional Differences

None identified.

Version History

Version	Date	Action	Change Tracking
0	April 1, 2005	Effective Date	New
0	August 8, 2005	Removed "Proposed" from Effective Date	Errata
1	October 17, 2008	Deleted R2 Replaced Levels of Non-compliance with the February 28, 2008 BOT approved Violation Severity Levels Corrected typographical errors in BOT approved version of VSLs	Revised
2	To be determined	Removed R2.4 as redundant with EOP-005-2 Requirement R1 for the Transmission Operator; the Balancing Authority does not need a restoration plan.	
2	August 5, 2009	Approved by Board of Trustees	Revised

Attachment 1-EOP-001-2

Elements for Consideration in Development of Emergency Plans

1. Fuel supply and inventory — An adequate fuel supply and inventory plan that recognizes reasonable delays or problems in the delivery or production of fuel.

2. Fuel switching — Fuel switching plans for units for which fuel supply shortages may occur, e.g., gas and light oil.

3. Environmental constraints — Plans to seek removal of environmental constraints for generating units and plants.

4. System energy use — The reduction of the system's own energy use to a minimum.

5. Public appeals — Appeals to the public through all media for voluntary load reductions and energy conservation including educational messages on how to accomplish such load reduction and conservation.

6. Load management — Implementation of load management and voltage reductions, if appropriate.

7. Optimize fuel supply — The operation of all generating sources to optimize the availability.

8. Appeals to customers to use alternate fuels — In a fuel emergency, appeals to large industrial and commercial customers to reduce non-essential energy use and maximize the use of customer-owned generation that rely on fuels other than the one in short supply.

9. Interruptible and curtailable loads — Use of interruptible and curtailable customer load to reduce capacity requirements or to conserve the fuel in short supply.

10. Maximizing generator output and availability — The operation of all generating sources to maximize output and availability. This should include plans to winterize units and plants during extreme cold weather.

11. Notifying IPPs — Notification of cogeneration and independent power producers to maximize output and availability.

12. Requests of government — Requests to appropriate government agencies to implement programs to achieve necessary energy reductions.

13. Load curtailment — A mandatory load curtailment plan to use as a last resort. This plan should address the needs of critical loads essential to the health, safety, and welfare of the community. Address firm load curtailment.

14. Notification of government agencies — Notification of appropriate government agencies as the various steps of the emergency plan are implemented.

15. Notifications to operating entities — Notifications to other operating entities as steps in emergency plan are implemented.

A. Introduction

1. **Title:** **Emergency Operations Planning**~~—~~

2. **Number:** EOP-001-~~0~~2

3. **Purpose:** Each Transmission Operator and Balancing Authority needs to develop, maintain, and implement a set of plans to mitigate operating emergencies. These plans need to be coordinated with other Transmission Operators and Balancing Authorities, and the Reliability Coordinator.

4. **Applicability**

   4.1. Balancing Authorities.

   4.2. Transmission Operators.

5. **Proposed Effective Date:** ~~April 1, 2005~~ Twenty-four months after the first day of the first calendar quarter following applicable regulatory approval. In those jurisdictions where no regulatory approval is required, all requirements go into effect twenty-four months after Board of Trustees adoption.

B. Requirements

R1. Balancing Authorities shall have operating agreements with adjacent Balancing Authorities that shall, at a minimum, contain provisions for emergency assistance, including provisions to obtain emergency assistance from remote Balancing Authorities.

~~**R2.** The Transmission Operator shall have an emergency load reduction plan for all identified IROLs. The plan shall include the details on how the Transmission Operator will implement load reduction in sufficient amount and time to mitigate the IROL violation before system separation or collapse would occur. The load reduction plan must be capable of being implemented within 30 minutes.~~

R2. Each Transmission Operator and Balancing Authority shall:

R2.1. Develop, maintain, and implement a set of plans to mitigate operating emergencies for insufficient generating capacity.

R2.2. Develop, maintain, and implement a set of plans to mitigate operating emergencies on the transmission system.

R2.3. Develop, maintain, and implement a set of plans for load shedding.

R3. Each Transmission Operator and Balancing Authority shall have emergency plans that will enable it to mitigate operating emergencies. At a minimum, Transmission Operator and Balancing Authority emergency plans shall include:

R3.1. Communications protocols to be used during emergencies.

R3.2. A list of controlling actions to resolve the emergency. Load reduction, in sufficient quantity to resolve the emergency within NERC-established timelines, shall be one of the controlling actions.

R3.3. The tasks to be coordinated with and among adjacent Transmission Operators and Balancing Authorities.

R3.4. Staffing levels for the emergency.

R4. Each Transmission Operator and Balancing Authority shall include the applicable elements in Attachment 1-EOP-001-0 when developing an emergency plan.

R5. The Transmission Operator and Balancing Authority shall annually review and update each emergency plan. The Transmission Operator and Balancing Authority shall provide a copy of its updated emergency plans to its Reliability Coordinator and to neighboring Transmission Operators and Balancing Authorities.

R6. The Transmission Operator and Balancing Authority shall coordinate its emergency plans with other Transmission Operators and Balancing Authorities as appropriate. This coordination includes the following steps, as applicable:

R6.1. The Transmission Operator and Balancing Authority shall establish and maintain reliable communications between interconnected systems.

R6.2. The Transmission Operator and Balancing Authority shall arrange new interchange agreements to provide for emergency capacity or energy transfers if existing agreements cannot be used.

R6.3. The Transmission Operator and Balancing Authority shall coordinate transmission and generator maintenance schedules to maximize capacity or conserve the fuel in short supply. (This includes water for hydro generators.)

R6.4. The Transmission Operator and Balancing Authority shall arrange deliveries of electrical energy or fuel from remote systems through normal operating channels.

C. Measures

M1. The Transmission Operator and Balancing Authority shall have its emergency plans available for review by the Regional Reliability Organization at all times.

M2. The Transmission Operator and Balancing Authority shall have its two most recent annual self-assessments available for review by the Regional Reliability Organization at all times.

D. Compliance

1. Compliance Monitoring Process

1.1. Compliance Monitoring Responsibility

Regional Reliability Organization.

1.2. Compliance Monitoring Period and Reset ~~Timeframes~~Time Frame

The Regional Reliability Organization shall review and evaluate emergency plans every three years to ensure that the plans consider the applicable elements of Attachment 1-EOP-001-0.

The Regional Reliability Organization may elect to request self-certification of the Transmission Operator and Balancing Authority in years that the full review is not done.

Reset: one calendar year.

1.3. Data Retention

Current plan available at all times.

1.4. Additional Compliance Information

Not specified.

2. Violation Severity Levels:

Requirement	Lower	Moderate	High	Severe
R1	The Balancing Authority failed to demonstrate the existence of the necessary operating agreements for less than 25% of the adjacent BAs. Or less than 25% of those agreements do not contain provisions for emergency assistance.	The Balancing Authority failed to demonstrate the existence of the necessary operating agreements for 25% to 50% of the adjacent BAs. Or 25 to 50% of those agreements do not contain provisions for emergency assistance.	The Balancing Authority failed to demonstrate the existence of the necessary operating agreements for 50% to 75% of the adjacent BAs. Or 50% to 75% of those agreements do not contain provisions for emergency assistance.	The Balancing Authority failed to demonstrate the existence of the necessary operating agreements for 75% or more of the adjacent BAs. Or more than 75% of those agreements do not contain provisions for emergency assistance.
R2	The Transmission Operator or Balancing Authority failed to comply with one (1) of the sub-components.	The Transmission Operator or Balancing Authority failed to comply with two (2) of the sub-components.	N/A	The Transmission Operator or Balancing Authority has failed to comply with three (3) of the sub-components.
R2.1	The Transmission Operator or Balancing Authority's emergency plans to mitigate insufficient generating capacity are missing minor details or minor program/procedural elements.	The Transmission Operator or Balancing Authority's has demonstrated the existence of emergency plans to mitigate insufficient generating capacity emergency plans but the plans are not maintained.	The Transmission Operator or Balancing Authority's emergency plans to mitigate insufficient generating capacity emergency plans are neither maintained nor implemented.	The Transmission Operator or Balancing Authority has failed to develop emergency mitigation plans for insufficient generating capacity.
R2.2	The Transmission Operator or Balancing Authority's plans to mitigate transmission system emergencies are missing minor details or minor program/procedural elements.	The Transmission Operator or Balancing Authority's has demonstrated the existence of transmission system emergency plans but are not maintained.	The Transmission Operator or Balancing Authority's transmission system emergency plans are neither maintained nor implemented.	The Transmission Operator or Balancing Authority has failed to develop, maintain, and implement operating emergency mitigation plans for emergencies on the transmission system.

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Requirement	Lower	Moderate	High	Severe
R2.3	The Transmission Operator or Balancing Authority's load shedding plans are missing minor details or minor program/procedural elements.	The Transmission Operator or Balancing Authority's has demonstrated the existence of load shedding plans but are not maintained.	The Transmission Operator or Balancing Authority's load shedding plans are partially compliant with the requirement but are neither maintained nor implemented.	The Transmission Operator or Balancing Authority has failed to develop, maintain, and implement load shedding plans.
R3	The Transmission Operator or Balancing Authority failed to comply with one (1) of the sub-components.	The Transmission Operator or Balancing Authority failed to comply with two (2) of the sub-components.	The Transmission Operator or Balancing Authority has failed to comply with three (3) of the sub-components.	The Transmission Operator or Balancing Authority has failed to comply with all four (4) of the sub-components.
R3.1	The Transmission Operator or Balancing Authority's communication protocols included in the emergency plan are missing minor program/procedural elements.	N/A	N/A	The Transmission Operator or Balancing Authority has failed to include communication protocols in its emergency plans to mitigate operating emergencies.
R3.2	The Transmission Operator or Balancing Authority's list of controlling actions has resulted in meeting the intent of the requirement but is missing minor program/procedural elements.	N/A	The Transmission Operator or Balancing Authority provided a list of controlling actions, however the actions fail to resolve the emergency within NERC-established timelines.	The Transmission Operator or Balancing Authority has failed to provide a list of controlling actions to resolve the emergency.

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Requirement	Lower	Moderate	High	Severe
R3.3	The Transmission Operator or Balancing Authority has demonstrated coordination with Transmission Operators and Balancing Authorities but is missing minor program/procedural elements.	N/A	N/A	The Transmission Operator or Balancing Authority has failed to demonstrate the tasks to be coordinated with adjacent Transmission Operator and Balancing Authorities as directed by the requirement.
R3.4	The Transmission Operator or Balancing Authority's emergency plan does not include staffing levels for the emergency	N/A	N/A	N/A
R4	The Transmission Operator and Balancing Authority's emergency plan has complied with 90% or more of the number of sub-components.	The Transmission Operator and Balancing Authority's emergency plan has complied with 70% to 90% of the number of sub-components.	The Transmission Operator and Balancing Authority's emergency plan has complied with between 50% to 70% of the number of sub-components.	The Transmission Operator and Balancing Authority's emergency plan has complied with 50% or less of the number of sub-components
R5	The Transmission Operator and Balancing Authority is missing minor program/procedural elements.	The Transmission Operator and Balancing Authority has failed to annually review one of it's emergency plans	The Transmission Operator and Balancing Authority has failed to annually review two of its emergency plans or communicate with one of it's neighboring Balancing Authorities.	The Transmission Operator and Balancing Authority has failed to annually review and/or communicate any emergency plans with its Reliability Coordinator, neighboring Transmission Operators or Balancing Authorities.
R6	The Transmission Operator and/or the Balancing Authority failed to comply with one (1) of the sub-components.	The Transmission Operator and/or the Balancing Authority failed to comply with two (2) of the sub-components.	The Transmission Operator and/or the Balancing Authority has failed to comply with three (3) of the sub-components.	The Transmission Operator and/or the Balancing Authority has failed to comply with four (4) or more of the sub-components.

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Requirement	Lower	Moderate	High	Severe
R6.1	The Transmission Operator or Balancing Authority has failed to establish and maintain reliable communication between interconnected systems.	N/A	N/A	N/A
R6.2	The Transmission Operator or Balancing Authority has failed to arrange new interchange agreements to provide for emergency capacity or energy transfers with required entities when existing agreements could not be used.	N/A	N/A	N/A
R6.3	The Transmission Operator or Balancing Authority has failed to coordinate transmission and generator maintenance schedules to maximize capacity or conserve fuel in short supply.	N/A	N/A	N/A
R6.4	The Transmission Operator or Balancing Authority has failed to arrange for deliveries of electrical energy or fuel from remote systems through normal operating channels.	N/A	N/A	N/A

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E. Regional Differences

None identified.

Version History

Version	Date	Action	Change Tracking
0	April 1, 2005	Effective Date	New
0	August 8, 2005	Removed "Proposed" from Effective Date	Errata
1	October 17, 2008	Deleted R2 Replaced Levels of Non-compliance with the February 28, 2008 BOT approved Violation Severity Levels Corrected typographical errors in BOT approved version of VSLs	Revised
2	August 5, 2009	Removed R2.4 as redundant with EOP-005-2 Requirement R1 for the Transmission Operator; the Balancing Authority does not need a restoration plan.	Revised
2	August 8, 2009	Adopted by NERC Board of Trustees: August 5, 2009	Revised

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Attachment 1-EOP-001-0

Elements for Consideration in Development of Emergency Plans

1. Fuel supply and inventory — An adequate fuel supply and inventory plan that recognizes reasonable delays or problems in the delivery or production of fuel.

2. Fuel switching — Fuel switching plans for units for which fuel supply shortages may occur, e.g., gas and light oil.

3. Environmental constraints — Plans to seek removal of environmental constraints for generating units and plants.

4. System energy use — The reduction of the system's own energy use to a minimum.

5. Public appeals — Appeals to the public through all media for voluntary load reductions and energy conservation including educational messages on how to accomplish such load reduction and conservation.

6. Load management — Implementation of load management and voltage reductions, if appropriate.

7. Optimize fuel supply — The operation of all generating sources to optimize the availability.

8. Appeals to customers to use alternate fuels — In a fuel emergency, appeals to large industrial and commercial customers to reduce non-essential energy use and maximize the use of customer-owned generation that rely on fuels other than the one in short supply.

9. Interruptible and curtailable loads — Use of interruptible and curtailable customer load to reduce capacity requirements or to conserve the fuel in short supply.

10. Maximizing generator output and availability — The operation of all generating sources to maximize output and availability. This should include plans to winterize units and plants during extreme cold weather.

11. Notifying IPPs — Notification of cogeneration and independent power producers to maximize output and availability.

12. Requests of government — Requests to appropriate government agencies to implement programs to achieve necessary energy reductions.

13. Load curtailment — A mandatory load curtailment plan to use as a last resort. This plan should address the needs of critical loads essential to the health, safety, and welfare of the community. Address firm load curtailment.

14. Notification of government agencies — Notification of appropriate government agencies as the various steps of the emergency plan are implemented.

15. Notifications to operating entities — Notifications to other operating entities as steps in emergency plan are implemented.

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