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](https://www.nerc.net/nercsurvey/Survey.aspx?s=e87ca0944672424c8a6d1ea67fe045c8) 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:

1. 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:

1. 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:

1. 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:

1. 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:

1. 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:

1. 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:

1. 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:

1. 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:

1. 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:

1. 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:

1. 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:

1. 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:

1. 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:

1. 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:

1. 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:

1. 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: