

Individual or group. (34 Responses)

Name (19 Responses)

Organization (19 Responses)

Group Name (15 Responses)

Lead Contact (15 Responses)

Contact Organization (15 Responses)

IF YOU WISH TO EXPRESS SUPPORT FOR ANOTHER ENTITY'S COMMENTS WITHOUT ENTERING ANY ADDITIONAL COMMENTS, YOU MAY DO SO HERE. (3 Responses)

Comments (34 Responses)

Question 1 (27 Responses)

Question 1 Comments (31 Responses)

Question 2 (26 Responses)

Question 2 Comments (31 Responses)

Question 3 (25 Responses)

Question 3 Comments (31 Responses)

Question 4 (24 Responses)

Question 4 Comments (31 Responses)

Question 5 (22 Responses)

Question 5 Comments (31 Responses)

Question 6 (27 Responses)

Question 6 Comments (31 Responses)

Individual
Greg Froehling
Rayburn Electric Cooperative
Yes
Yes
No
No
No
No
Individual
Winnie Holden
Public Service Enterprise Group
Yes
Yes
No
No

No
No
Group
Midwest Reliability Organization NERC Standards Review Forum (MRO NSRF)
Russ Mountjoy
Midwest reliability Organization
Yes
No
: NSRF requests that the SAR clarify whether Generator Operators may be assigned responsibility for requirements in this set of standards, and what those responsibilities may be. Although the SAR recommends review of EOP-002 Attachment 1 as it relates to the GOP due to recent BES cold weather events, the draft redline of EOP-002 does not suggest that GOPs be added to the applicability section, and does not propose to alter Attachment 1. NSRF questions whether cold weather preparedness should be addressed in Attachment 1 as the Standards Committee did not approve a cold weather SAR and NERC has issued a guideline tailored to the issue. NSRF recommends that the drafting team include additional information in the SAR on how standard requirements may be altered to apply to GOPs.
No
No
No
Yes
Please note that the NSRF has reviewed EOP-002-4 and R5 should have A threshold of being in an EEA prior to shedding load when not meeting your DCS or BAAL limit.
Individual
David Thorne
Pepco Holdings Inc.
Yes
Yes
No
No
No
Yes
EOP-001-3.3 R2.3 and EOP-003-3-3 R3 appear to be duplicative. Consider eliminating R2.3
Group
ACES Standards Collaborators
Ben Engelby
ACES

Yes
We appreciate the drafting team's efforts in removing unnecessary or redundant requirements from the EOP standards.
Yes
We support the removal of the LSE function from EOP-002.
No
No
No
Yes
We thank the drafting team for applying the 5 year review team's recommendations and the proposal in the SAR to remove requirements that meet Paragraph 81 criteria.
Individual
Michael Falvo
Independent Electricity System Operator
Yes
We generally agree with the scope proposed in the SAR. However, since the draft standards are also posted, we would offer the following initial comments on the following draft standards: EOP-001-2: We suggest combining R3 and R4. R3 requires each TOP and BA to have an emergency plan and, as a minimum, the plan needs to include the tasks to be coordinated with and among adjacent TOPs and BAs. R4 requires the emergency plan to include the applicable elements in Attachment 1-EOP-001. We do not see the need for having two separate requirements each of which requires the inclusion of certain elements to ensure reliable operations under emergency. Hence, we propose to combine R3 and R4 by requiring each TOP and BA to develop an emergency plan that will include (a) the tasks to be coordinated with and among adjacent TOPs and BAs and (b) applicable elements in Attachment 1. EOP-002-4: We continue to disagree with the removal of R6. The response to comment by the 5-year review team indicates that this removal is consistent with P.81 criteria and the recommendations from the Independent Expert Review Panel Report. We do not believe this is the case since R6 spells out the actions a BA need to take when it is unable to meet DCS whereas the BAL standard (BAL-002, we believe) does not stipulate these actions. It only requires a BA or RSG to meet the DCS. It is conceivable that a BA that fails to meet DCS elect to do nothing (since the requirement is already violated), thus exposing the system to a risk of severe frequency excursion and potential collapse if another resource loss contingency occurs before the required reserve is replenished. We also wish to reiterate our proposal to review whether or not R9 should be removed. In the Comment Report, there is no mention of the concern we raised over the removal of R9 and hence we are unable to determine if the SDT has overlooked our comment, or the SDT decided that the removal of R9 was justified based on specific technical assessment or industry support. As indicated in our previous comment, R9 has several subrequirements some of which could be removed thanks to technology advances and adequate coverage by the e-tag spec and/or other communication protocol. However, there are requirements that still require actions by the responsible entities such as the LSE and the RC, which cannot be replaced by technology or IT tools. We suggest the SDT review this again in developing the next draft of EOP-002-4. EOP-003-3 In the Comment Report, there is no mention of the concern we raised over the removal of R6 in relation to R1. We thus wish to reiterate our proposal to review and revise R1 given that R6 will be removed. R6 as written addresses frequency problems and the results of UFLS operations only. R1 as written does not make this distinction, and it asks for load shedding – automatic and/or manual, to address transmission and resource problems. Without R6 and without revising R1, Responsible Entities may simply rely on automatic load shedding schemes (UFLS and UVLS) to address transmission and resource concerns without taking the next steps to implement manual load shedding after the automatic load shedding operations. We suggest the SDT to review the scope of R1, and revise it as

necessary to cover both transmission and resource aspects using automatic and manual load shedding as remedial measures.
Yes
No
Yes
The proposed removal of Requirement R9 of EOP-002 may result in a need to introduce certain business practices in the NAESB standards, especially those subrequirements in R9 that address elevating transmission service priority under emergency. Please also see our comments under Q2, above, that raise a concern over the complete removal of R9.
No
No
Individual
Scott McGough
Georgia System Operations
Yes
No
These standards should not be applicable to LSEs. Possibly its an oversight that the redlined version of EOP-002-4 has LSEs removed; however the SAR still has reference to LSE?
Yes
There were no questions about the drafted revisions to the standards - only about the SAR. Will there be a comment period for the standards (assuming the SAR gets approved)?
Group
Dominion
Randi Heise
Dominion
Yes
No
The LSE has been removed from EOP-002-3.1, and since there are no remaining responsibilities for the LSE, Dominion suggests removing LSE from the SAR.
No
No
No
No
Individual

Anthony Jablonski
ReliabilityFirst
Yes
1. Within the comment form introduction text, it was noted that the FYRT recommended that the EOP SDT consider two specific changes (1 - EOP-001-2.1b, Requirements R1 and R8 should be considered for combination and 2 - The EOP FYRT recommended merging EOP-001-2.1b and EOP-002-3.1 into a single standard) , though the redlined versions of the two standards do not reflect these recommendations. ReliabilityFirst requests clarification on why these two recommendations were not included in the draft redlined versions.
Yes
No
No
No
Yes
2. ReliabilityFirst recommends that a document be developed explaining the rationale behind each of the individual changes being proposed. For example, if an entire requirement is being removed, the associated rationale should be provided so industry will know exactly what facilitated the proposed change (e.g., was the change facilitated by the FYRP, IERP, Paragraph 81 criteria, FERC Directive, etc.). If this rational can be provided to industry prior to formal posting, it will give industry context on the basis of the changes, hence proactively eliminating a number of questions on the front end. ReliabilityFirst understands this current comment period is strictly for the SAR, but would like to have this comment supplied to the forthcoming SDT if this effort moves forward.
Individual
Thomas Foltz
American Electric Power
No
The future SDT needs to map the Attachment 1 Elements in EOP-001 to the requirements for a specific applicable NERC Entity. EOP-001 R4 uses the term "applicable" but this needs to be more concise and mapped to the appropriate NERC Entity as a requirement instead of an Attachment.
No
It appears that LSE is being removed from the standards as an applicable entity. Does removal of a functional entity dictate that it be noted in the SAR's applicable entity section? If not, what is the purpose of having it selected?
No
Yes
This standard needs to be flexible enough to accommodate the various arrangements and responsibilities that exist within the various RTO's and other hierarchies. EOP-001-3 R1: The requirement does not specify the Transmission Operator, but M1 does. Attachment 1 * Not every single element listed would always apply to both the BA and TOP. This attachment might be made more clear if it could somehow be segmented by Functional Entity applicability. In addition, this list of elements is highly prescriptive. We also suggest simplifying the list. * Element 11: The drafting team needs to explicitly address whether or not windfarms are in scope. EOP-002-4 R5: Failing to comply with control-based requirements such as CPS and DCS, though important, may not

necessitate the prescribed actions in 5.1 and 5.2 in all circumstances. These generally require you to get within a bounds within a prescribed time, and though the entity may be taking action, it may not be in the timeliness prescribed. As currently written, this requirement would require declaring an EEA event or shedding load even when other viable options are still available. Attachment 1, Alert 2 Section For public appeals to be effective, they need to be released sooner rather than later. Since Public Appeals take some time to be effective at reducing load, we feel that Public Appeals need to be called sooner than the EEA2 level. EOP-003-3 R2 – Undervoltage load shedding should be added as an exclusion in addition to automatic under-frequency load shedding .

Group

Florida Municipal Power Agency

Frank Gaffney

Florida Municipal Power Agency

Yes

The scope is appropriate, but the effort needs to be comprehensive and assure that duplication is fully addressed across these three specific standards, plus the remainder of the EOP standards along with others as appropriate. There were numerous comments in the 5 year review that raised this concern and it appears that many of those comments were addressed. But as an example, the redlined standards still appear to address load shedding in both EOP 001 R2 2.3 and EOP 003.

No

a. EOP 001 R2 2.1 should not apply to TOPs. b. EOP 002 R1 is being eliminated, yet this requirement provides the BA clear decision making authority. c. EOP 003 should become a TOP-only standard for manual load shedding since load shedding for BA's is really only for capacity/energy emergencies and should be a part of EOP 002.

No

No

No

No

Individual

Richard Vine

California ISO

Agree

ISO/RTO Standards Review Committee

Individual

Kathleen Goodman

ISO New England Inc.

Agree

IRC SRC

Group

PacifiCorp

Ryan Millard

PacifiCorp

Yes

Yes

Yes
No
No
No
Individual
Andrew Gallo
City of Austin dba Austin Energy
Yes
Yes
No
No
No
Yes
City of Austin dba Austin Energy (AE) supports the efforts of the SAR SDT. Regarding the redlined standards, AE suggests the following: (1) Consider identifying which items in Attachment 1-EOP-001 apply to TOPs and which apply to BAs. (2) Proposed Requirement R2 in EOP-003-3 should likely exclude automatic UVLS plans (similar to the way it currently excludes automatic UFLS plans) if the intent is to leave UVLS items to the PRC standards in Project 2008-02.
Individual
Andrew Z. Pusztai
American Transmission Company, LLC
Yes
Yes
No
No
No
Yes
Editorial Only: On the Unofficial Comment form, it states "EOP-001-2.1b, Requirements R1 and R8 should be considered for combination". This should be corrected to "EOP-003-2, Requirements R1 and R8 should be considered for combination". The SAR is correct.
Group
SPP Standards Review Group
Robert Rhodes

Southwest Power Pool
No
We recommend that the drafting team expand their coordination efforts to include all projects which are impacted or have an impact on the set of EOP standards in this package. All of the standards in the Related Standards table in the SAR are either actively under development or have recently been approved by the industry. Close coordination with the changes proposed in those projects is necessary in the development of the EOP standards. For example, BAL-001-2 eliminates CPS2 which is specifically referenced in EOP-002-4.
No
We note the inclusion of the Generator Operator and Load Serving Entity as Applicable Entities in the SAR but yet do not see a requirement in either of the three standards that holds these entities accountable for any action. The Generator Operator is implied in Attachment 1 of EOP-001-3 but there are no specific references to the Generator Operator in the standard. Similarly, the Load-Serving Entity is included in Attachment 1 of EOP-002-4 but has no responsibility in the standard itself. What is the linkage between being referenced, or implied, in an attachment to a standard and being listed as an Applicable Entity in the SAR? We also note that the posted redline of EOP-002-4 indicates the Load-Serving Entity is to be deleted as an Applicable Entity in that standard.
No
Given our limited involvement with the detailed functioning of other regions, we are not aware of any regional variances which may be needed, especially within the Southwest Power Pool.
No
Yes
We believe there are special regulatory requirements for international transactions. If these requirements still exist, they would need to be considered in the development of EOP-001-3 and EOP-002-4.
Yes
EOP-001-3 requires Balancing Authorities to have operating agreements with adjacent, and possibly remote, Balancing Authorities. With the advent of the super BA with vast generating resources, is it necessary to maintain the requirement for these operating agreements? Additionally, the IRO standards give the Reliability Coordinator authority to order delivery of emergency assistance as needed within its Reliability Coordinator footprint. It would appear a requirement to have these operating agreements for sharing emergency assistance is no longer relevant. The comment form does not specifically address the posted redline versions of the standards and it is unclear if the drafting team is actually seeking our comments on those redlines at this time. We wholeheartedly support the effort to revise the existing standards. As a first pass the redlined versions are an improvement over the existing standards but a significant amount of modification is still needed. We look forward to working with the drafting team as this project develops.
Group
Southern Company
Wayne Johnson
Southern Company Services, Operations Compliance
Yes
Yes
No
No

No
Yes
EOP-001 R1 – SERC OC Comments EOP-001-2.1b R1 should eliminate the obligation for BAs to establish “provisions for obtaining emergency assistance from remote BAs.” Regardless of the definition of “remote” as addressed in the interpretation, reliability standards do not need to impose a requirement on BAs to pre-arrange sources of emergency assistance from non-adjacent BAs. In fact, adjacency should not be a parameter addressed by the Requirement, as long as adequate delivery arrangements are in place. Comments for EOP-001-3 R2, R2.1, R2.3, R2.3 and EOP-002-4 R1, R2 EOP-002-4 R1 and R2 are redundant with EOP-001-3 R2 and its sub-requirements. The implementation of a set of plans as required by EOP-001-3 R2 mirrors taking action as described in EOP-002-4 R1 and R2. Due to the redundancy we ask the SDT to consider retiring EOP-002-4 R1 and R2. Comments for EOP-002-4 R3 The SDT is asked to consider adding the actions outlined in EOP-002-4 R3 to EOP-001 Attachment. The proposed EOP-002-4 R3 states: “A Balancing Authority anticipating an operating capacity or energy emergency shall perform all actions necessary including bringing on all available generation, postponing equipment maintenance, scheduling interchange purchases in advance, and being prepared to reduce firm load.” We propose deleting EOP-002-4 R3 from the standard since adding the actions in EOP-002-4 R3 to EOP-001 Attachment 1 will eliminate the need of listing the actions in EOP-002 R3. EOP-001-3 M2 Comment Measure 2 is unclear and does not appear to correlate to any action required on R2. Measure 2 should be modified to allow the registered entity to make its plans available to the auditors for review. If an entity has experienced an event that warranted using the plan, the entity could demonstrate “implementation”. If an entity has not experienced an event, the entity could demonstrate that all TOP / BA operators have been trained on the plans. 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. Comments for EOP-002 R5 Pending BAL requirements address CPS and DCS requirements. BAL-002-1a addresses DCS and BAL-001-2 addresses CPS. The way the current draft reads would pose potential issues with complying with the BAL on the “high side.” For example, if an entity can not comply with BAL, then shedding load will only intensify the problem. Consequently, we ask that the SDT review the BAL standards to ensure that the BAL and EOP standards are in sync. After reviewing, we suggest the SDT to consider rewording EOP-002 R5 to state: “If the Balancing Authority cannot comply with the Control Performance and Disturbance Control Standards by implementing the actions in EOP-001 Attachment 1, the Balancing Authority shall: R5.1. Manually shed firm load without delay to return its ACE to zero; and R5.2. Request the Reliability Coordinator to declare an Energy Emergency Alert in accordance with Attachment 1-EOP-002 “Energy Emergency Alerts.” Comments for EOP-003-3 We suggest removing the BA function from EOP-003-3 and making this a TOP requirement only. The BA function is prepared for capacity and energy emergencies in EOP-002-4, which includes the scope of EOP-003-3 for BAs. EOP-003-3 R2, we ask for the SDT to clarify automatic or manual load shedding as stated: “Each Transmission Operator and Balancing Authority shall coordinate load shedding plans among other interconnected Transmission Operators and Balancing Authorities.” We suggest that the SDT reword R2 to state: “Each Transmission Operator and Balancing Authority shall coordinate operator controlled manual load shedding plans, excluding automatic under-frequency load shedding plans, among other interconnected Transmission Operators and Balancing Authorities.”
Individual
Bob Thomas
Illinois Municipal Electric Agency
Yes
Yes
No
No

No
Group
PPL NERC Registered Affiliates
Brent Ingebrigtsen
LG&E and KU Services
These comments are submitted on behalf of the following PPL NERC Registered Affiliates (PPL): Louisville Gas and Electric Company and Kentucky Utilities Company; PPL Electric Utilities Corporation, PPL EnergyPlus, LLC; PPL Generation, LLC; PPL Susquehanna, LLC; and PPL Montana, LLC. The PPL NERC Registered Affiliates are registered in six regions (MRO, NPCC, RFC, SERC, SPP, and WECC) for one or more of the following NERC functions: BA, DP, GO, GOP, IA, LSE, PA, PSE, RP, TO, TOP, TP, and TSP.
Yes
PPL NERC Registered Affiliates has concerns about the redlined version of EOP-002-3 Requirement R5. The meaning of "comply with the Control Performance and Disturbance Control Standards" is unclear. For example, it could mean that the BA has actually violated the Standards or that it is clear that the BA will violate the Standards. Since it is unknown what the intent of the SME team was when it proposed the change, we cannot suggest proposed language as an alternative.
Group
Bureau of Reclamation
Erika Doot
Power Resources Office
Yes
No
The Bureau of Reclamation (Reclamation) requests that the SAR clarify whether Generator Operators (GOPs) may be assigned responsibility for requirements in this set of standards, and what those responsibilities may be. The SAR indicates that the standards will apply to the GOP function, but the draft redline standards do not include GOPs in the applicability sections. Although the SAR recommends review of Attachment 1 as it relates to the GOP due to recent BES cold weather events, the draft redline does not propose to alter Attachment 1. Reclamation questions whether GOP cold weather preparedness should be addressed in Attachment 1. Reclamation recommends that the drafting team include additional information in the SAR on how standard requirements may be altered to apply to GOPs, and whether this would be limited to cold weather preparedness.
No
No
Group
Duke Energy
Michael Lowman
Duke Energy

Yes
No
Duke Energy questions the need to add LSE and GOP as responsible entities. Neither is listed in EOP-001, EOP-002, or EOP-003 as Applicable Function.
No
No
No
Individual
Bill Fowler
City of Tallahassee (TAL)
Yes
EOP-002-4, Proposed R1 should be a subset of R3. You can meet R1 by taking any one action necessary, but you could still be deficient by not taking all necessary actions per R3. The City of Tallahassee (TAL) recommends adding the elements of R3 to EOP-001-3, Attachment 1. Having elements of an Emergency Plan in 2 different spots is hard to follow and could lead to missed requirements. As written, they do not have to be part of a written plan, but do need to be performed in the anticipated horizon. Table of Compliance Elements is now difficult to follow since it was not refreshed with new requirement numbers. The Heading should be repeated on all pages of the table. Attachment 1 section 3.6 is a reporting requirement. Requirements should not be buried in attachments. TAL questions the necessity of this inclusion given the revised EOP-004-2. Also, Attachment 1 applies to LSEs, but LSEs were removed from the Applicability for this standard. =====
EOP-003-3, The remaining requirements are duplicative of the requirements in EOP-001-3. EOP-003-1 R1- "After taking all other remedial steps, a Transmission Operator or Balancing Authority operating with insufficient generation or transmission capacity shall shed customer load rather than risk an uncontrolled failure of components or cascading outages of the Interconnection." EOP-001-3 R2.3 – "Develop, maintain, and implement a set of plans for load shedding." EOP-003-3, R2 – "Each Transmission Operator and Balancing Authority shall coordinate load shedding plans, excluding automatic under-frequency load shedding plans, among other interconnected Transmission Operators and Balancing Authorities." EOP-001-3, 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. – or – EOP-001-3, R3.3 – "The tasks to be coordinated with and among adjacent Transmission Operators and Balancing Authorities. EOP-003-3, R3 – "Each Transmission Operator or Balancing Authority shall have plans for operator controlled manual load shedding to respond to real-time emergencies. The Transmission Operator or Balancing Authority shall be capable of implementing the load shedding in a timeframe adequate for responding to the emergency." EOP-001-3, R2.3 – "Develop, maintain, and implement a set of plans for load shedding." If the SDT does not agree the intent or spirit of EOP-003 is captured as described, TAL recommends substantiating EOP-001, and then eliminating EOP-003. Having similar requirements in 2 different standards is contrary to the progress being made with Paragraph 81 and RAIs.

Group
Northeast Power Coordinating Council
Guy Zito
Northeast Power Coordinating Council
Yes
With regard to EOP-001-2, R3 requires each TOP and BA to have an emergency plan and, as a minimum, the plan needs to include the tasks to be coordinated with and among adjacent TOPs and BAs. R4 requires the emergency plan to include the applicable elements in Attachment 1-EOP-001. There is no need for having two separate requirements each of which requiring the inclusion of certain elements to ensure reliable emergency operations. Propose to combine R3 and R4 by requiring each TOP and BA to develop an emergency plan that will include the tasks to be coordinated with and among adjacent TOPs and BAs and applicable elements in Attachment 1. Regarding EOP-002-4, we disagree with the removal of R6. The response to comments by the 5-year review team indicates that this removal is consistent with P81 criteria, and the recommendations from the Independent Expert Review Panel Report. This is not the case since R6 spells out the actions a BA need to take when it is unable to meet DCS whereas the BAL standard (BAL-002) does not stipulate these actions. It only requires a BA or RSG to meet the DCS. It is conceivable that a BA that fails to meet DCS can elect to do nothing (since the requirement is already violated), thus exposing the system to a risk of a severe frequency excursion and potential collapse if another resource contingency occurs before the required reserve is replenished. The removal of R9 should be reconsidered by the SDT. R9 has several parts, some of which could be removed because of technological advances and adequate coverage by the e-tag spec and/or other communication protocols. Part 9.1 should be retained because it still requires actions by the responsible entities such as the LSE and the RC, which cannot be replaced by technology or IT tools. The SDT should consider retaining the concept of Part 9.1. Regarding EOP-003-3, given that R6 will be removed, review and revise R1. R6 as written addresses frequency problems and the results of UFLS operations only. R1 as written does not make this distinction, and it asks for load shedding – automatic and/or manual, to address transmission and resource problems. Without R6 and without revising R1, Responsible Entities may simply rely on automatic load shedding schemes (UFLS and UVLS) to address transmission and resource concerns without taking the next steps to implement manual load shedding after the automatic load shedding operations. We suggest the SDT to review the scope of R1, and revise it as necessary to cover both transmission and resource aspects using automatic and manual load shedding as remedial measures.
Yes
No
Yes
The proposed removal of Requirement R9 of EOP-002 may result in a need to introduce certain business practices in the NAESB standards, especially those parts of R9 that address elevating transmission service priority in an emergency. Refer to our comments to Question 2 above that raise a concern over the complete removal of R9.
No
Individual
Joe O'Brien on behalf of David Austin
NIPSCO
Yes
Yes

No

No

No

Yes

EOP-001 I would suggest moving R2.3 into EP-003. R3 seems redundant with R2 and should be removed altogether. The remaining sub-requirement R3.3 should be merged with the existing R4 to read: "R3 Each Transmission Operator and Balancing Authority shall include the tasks to be coordinated with and among adjacent Transmission Operators and Balancing Authorities, in addition to the applicable elements in Attachment 1-EOP-001, when developing an emergency plan." In an effort to remove some of the redundancy from the standards, R4 should specify which emergency plans it applies to, namely those identified in R2. From the way the requirement currently reads, this could technically apply to emergency plans developed in EOP-003 and EOP-005. EOP-002 I agree with all the proposed changes. EOP-003 I agree with all the proposed changes, with the proposed addition suggested above.

Individual

Scott Langston

City of Tallahassee

Yes

EOP-002-4, Proposed R1 should be a subset of R3. You can meet R1 by taking any one action necessary, but you could still be deficient by not taking all necessary actions per R3. The City of Tallahassee (TAL) recommends adding the elements of R3 to EOP-001-3, Attachment 1. Having elements of an Emergency Plan in 2 different spots is hard to follow and could lead to missed requirements. As written, they do not have to be part of a written plan, but do need to be performed in the anticipated horizon. Table of Compliance Elements is now difficult to follow since it was not refreshed with new requirement numbers. The Heading should be repeated on all pages of the table. Attachment 1 section 3.6 is a reporting requirement. Requirements should not be buried in attachments. TAL questions the necessity of this inclusion given the revised EOP-004-2. Also, Attachment 1 applies to LSEs, but LSEs were removed from the Applicability for this standard. EOP-003-3, The remaining requirements are duplicative of the requirements in EOP-001-3. EOP-003-1, R1- "After taking all other remedial steps, a Transmission Operator or Balancing Authority operating with insufficient generation or transmission capacity shall shed customer load rather than risk an uncontrolled failure of components or cascading outages of the Interconnection." EOP-001-3 R2.3 – "Develop, maintain, and implement a set of plans for load shedding." EOP-003-3, R2 – "Each Transmission Operator and Balancing Authority shall coordinate load shedding plans, excluding automatic under-frequency load shedding plans, among other interconnected Transmission Operators and Balancing Authorities." EOP-001-3, 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. – or – EOP-001-3, R3.3 – "The tasks to be coordinated with and among adjacent Transmission Operators and Balancing Authorities. EOP-003-3, R3 – "Each Transmission Operator or Balancing Authority shall have plans for operator controlled manual load shedding to respond to real-time emergencies. The Transmission Operator or Balancing Authority shall be capable of implementing the load shedding in a timeframe adequate for responding to the emergency." EOP-001-3, R2.3 – "Develop, maintain, and implement a set of plans for load shedding." If the SDT does not agree the intent or spirit of EOP-003 is

captured as described, TAL recommends substantiating EOP-001, and then eliminating EOP-003. Having similar requirements in 2 different standards is contrary to the progress being made with Paragraph 81 and RAIs.

Group

Tacoma Power

Chang Choi

Tacoma Power

Yes

Yes

No

No

No

Yes

EOP-002, R5.1 & R5.2 should be swapped due to the order that a BA must actually proceed. Also remedies that existed in the previous version R6 should have been retained and preceded the new R5.1 & R5.2 rather than being deleted entirely in this draft.

Group

MRO NERC Standards Review Forum

Russel Mountjoy

MRO

Yes

NSRF requests that the SAR clarify whether Generator Operators may be assigned responsibility for requirements in this set of standards, and what those responsibilities may be. Although the SAR recommends review of EOP-001 Attachment 1 as it relates to the GOP due to recent BES cold weather events, the draft redline of EOP-001 does not suggest that GOPs be added to the applicability section, and does not propose to alter Attachment 1. NSRF questions whether cold weather preparedness should be addressed in Attachment 1 as the Standards Committee did not approve a cold weather SAR and NERC has issued a guideline tailored to the issue. NSRF recommends that the drafting team include additional information in the SAR on how standard requirements may be altered to apply to GOPs.

The Standards Committee recently rejected a SAR that proposed a standard on cold weather preparedness. The Standards Committee decision was that the recently prepared NERC guideline on cold weather preparedness was adequate and that a standard was not needed. Based on this decision, the references to cold weather preparedness should not be included in these standards (e.g. in item 10 of attachment 1 of EOP-001-3)

Group

ISO/RTO Council Standards Review Committee

Greg Campoli

NYISO

Yes

We generally agree with the scope proposed in the SAR. However, since the draft standards are also posted, we would offer the following initial comments on the following draft standards: EOP-001-2: The word "adjacent" should be capitalized since Adjacent Balancing Authority is a defined term in the NERC Glossary. R1 does not have TOP as a Responsible Entity but M1 requires a TOP to provide evidence. Please review and resolve the discrepancy. R2 requires BAs to have plans to mitigate emergencies on the transmission system, but BAs have no obligation to model said transmission system. If BAs are required to have such plans, then the planned actions should be directed/requested by the TOPs. This needs to be made clear in the requirement. R2 requires the development of plans, not annual assessments, but Measure M2 requires that the last two annual assessments be available for review. Further, the evidence retention for R1, R2, R4 and R5 requires the most recent 3 calendar months plus the current month, which is consistent with the M2 evidence requirement for annual assessments/plans. Suggest to review and revise R2 and/or Measure M2 and/or the retention requirement for R2. We suggest combining R3 and R4. R3 requires each TOP and BA to have an emergency plan and, as a minimum, the plan needs to include the tasks to be coordinated with and among adjacent TOPs and BAs. R4 requires the emergency plan to include the applicable elements in Attachment 1-EOP-001. We do not see the need for having two separate requirements each of which requires the inclusion of certain elements to ensure reliable operations under emergency. Hence, we propose to combine R3 and R4 by requiring each TOP and BA to develop an emergency plan that will include (a) the tasks to be coordinated with and among adjacent TOPs and BAs and (b) applicable elements in Attachment 1. Measure M5 is missing. It needs to be a Measure that is needed to demonstrate that the TOP and BA have annually reviewed and updated each emergency plan. EOP-002-4: We appreciate the SDT's effort to retain the previous Requirement R6, now R5. However, a number of the optional actions listed in the previous R6 have been removed, resulting in only two actions – shedding firm load and declaring EEA to address a reserve/capacity shortfall after a BA fails to meet CPS and DCS requirements. We do not believe removing the other actions such as loading all available generation, curtail interruptible loads, etc. is helpful to reliability, nor do we believe that such actions are already presented in other standards to warrant them meeting the Paragraph 81 criteria. It is conceivable that a BA that fails to meet DCS elects to take none of these actions but just dive into shedding firm load. While shedding firm load may be the last resort to address a capacity shortfall, it is a general practice, and a prudent and rational one, to not shed firm load in a reserve shortfall (which may be the result of an MSSC event) until the actual capacity shortage occurs after the next resource contingency (in other words, why shed firm load for the sake of avoiding shedding firm load when a resource contingency occurs). We therefore once again suggest that the removed actions be re-inserted to R5. We also wish to reiterate our proposal to review whether or not R9 should be removed. In the Comment Report, there is no mention of the concern we raised over the removal of R9 and hence we are unable to determine if the SDT has overlooked our comment, or the SDT decided that the removal of R9 was justified based on specific technical assessment or industry support. As indicated in our previous comment, R9 has several sub-requirements some of which could be removed thanks to technology advances and adequate coverage by the e-tag spec and/or other communication protocol. However, there are requirements that still require actions by the responsible entities such as the LSE and the RC, which cannot be replaced by technology or IT tools. We suggest the SDT review this again in developing the next draft of EOP-002-4. EOP-003-3 R2: We suggest to replace "interconnected" with "Adjacent" since TOPs and BAs are all interconnected – directly or remotely. Leaving the word "interconnected" in place would mean these entities need to coordinate with all entities in an interconnection. R3: We suggest to drop the second sentence since the "capability" of an entity to shed firm load in response to an emergency is not measurable in a plan; it can only be measured when actions are taken to address an actual emergency. In the Comment Report, there is no mention of the concern we raised over the removal of R6 in relation to R1. We thus wish to reiterate our proposal to review and revise R1 given that R6 will be removed. R6 as written addresses frequency problems and the results of UFLS operations only. R1 as written does not make this distinction, and it asks for load shedding – automatic and/or manual, to address transmission and resource problems. Without R6 and without revising R1, Responsible Entities may simply rely on automatic load shedding schemes (UFLS and UVLS) to address transmission and resource concerns without taking the next steps to implement manual load shedding after the automatic load shedding operations. We suggest the SDT to review the scope of R1, and revise it as necessary to cover both

transmission and resource aspects using automatic and manual load shedding as remedial measures.
Yes
No
Yes
The proposed removal of Requirement R9 of EOP-002 may result in a need to introduce certain business practices in the NAESB standards, especially those sub-requirements in R9 that address elevating transmission service priority under emergency.
No
No
Individual
Karen Webb
City of Tallahassee - Electric Utility
Yes
EOP-002-4: Proposed R1 should be a subset of R3. You can meet R1 by taking any one action necessary, but you could still be deficient by not taking all necessary actions per R3. The City of Tallahassee (TAL) recommends adding the elements of R3 to EOP-001-3, Attachment 1. Having elements of an Emergency Plan in 2 different spots is hard to follow and could lead to missed requirements. As written, they do not have to be part of a written plan, but do need to be performed in the anticipated horizon. Table of Compliance Elements is now difficult to follow since it was not refreshed with new requirement numbers. The heading should be repeated on all pages of the table. Attachment 1 section 3.6 is a reporting requirement. Requirements should not be buried in attachments. TAL questions the necessity of this inclusion given the revised EOP-004-2. Also, Attachment 1 applies to LSEs, but LSEs were removed from the Applicability for this standard. EOP-003-3: The remaining requirements are duplicative of the requirements in EOP-001-3. EOP-003-1 R1- "After taking all other remedial steps, a Transmission Operator or Balancing Authority operating with insufficient generation or transmission capacity shall shed customer load rather than risk an uncontrolled failure of components or cascading outages of the Interconnection." EOP-001-3 R2.3 – "Develop, maintain, and implement a set of plans for load shedding." EOP-003-3, R2 – "Each Transmission Operator and Balancing Authority shall coordinate load shedding plans, excluding automatic under-frequency load shedding plans, among other interconnected Transmission Operators and Balancing Authorities." EOP-001-3, 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. – or – EOP-001-3, R3.3 – "The tasks to be coordinated with and among adjacent Transmission Operators and Balancing Authorities. EOP-003-3, R3 – "Each Transmission Operator or Balancing Authority shall have plans for operator controlled manual load shedding to respond to real-time emergencies. The Transmission Operator or Balancing Authority shall be capable of implementing the load shedding in a timeframe adequate for responding to the emergency." EOP-001-3, R2.3 – "Develop, maintain, and implement a set of plans for load shedding." If the SDT does not agree the intent or spirit of EOP-003 is captured as described, TAL recommends substantiating EOP-001, and then eliminating EOP-003.

Having similar requirements in 2 different standards is contrary to the progress being made with Paragraph 81 and RAIs.

Individual

Chris Scanlon

Exelon Companies

Yes

Yes

No

No

No

Yes

Exelon and its affiliates appreciate the work done by the drafting team for Project 2009-03 and will vote Affirmative on this ballot.

Individual

Doug Hohlbaugh

FirstEnergy

Yes

Yes

No

No

No

No

Group

Bonneville Power Administration

Jamison Dye

Transmission Reliability Standards Group

Yes

Yes

No

No

No

Yes

a) EOP-002: BPA agrees that the industry needs standards that are technically accurate and support the overall goal of ensuring bulk power system reliability. For the applicable entities to effectively comply, measurable and enforceable standards must be reasonable, clear, and unambiguous; thereby, minimizing the need for interpretation. Users, owners, and operators of the bulk power system should have no doubts with regards to what is required and who it is required of. Previous requirements, R6 and R7, for example, stated that entities should complete certain prerequisites to alleviate resources (R6) and after exhausting all those options, operators should manually shed load (R7). With the new R5 requirement, preceding required actions have been removed. BPA feels that requiring operators to shed load for a CPS problem is too severe of an action; however, BPA does feel that shedding load for a DCS issue is acceptable. BPA maintains that since preliminary actions (from previous requirements) have been removed, then NERC needs to emphasize in the new requirement that when entities do not meet CPS and DCS (both conditions must exist), that, in turn, could result in load shedding or schedule cuts. b) EOP=001: R1 says that we are supposed to have agreements with "adjacents" for emergency assistance and that BAs are also supposed to include in their agreements with adjacents provisions which allow the BA to obtain emergency assistance from "remote adjacents." The Appendix 1 responses for requirement 1 indicate — in spite of the fact that a BA may have an agreement with an adjacent for emergency assistance — that the adjacent BA, in turn, does not have to have a corresponding provision with a remote adjacent to share resources. BPA feels that the adjacent should have a provision to allow for this kind of sharing of resources — if you have an agreement with a remote, then you must have a provision so stating this mutual assistance.

Individual

Alice Ireland

Xcel Energy

Agree

SPP RTO