

## Comment Report

**Project Name:** 2015-08 Emergency Operations | EOP-004-4  
**Comment Period Start Date:** 11/18/2016  
**Comment Period End Date:** 1/9/2017  
**Associated Ballots:** 2015-08 Emergency Operations | EOP-004-4 EOP-004-4 AB 2 ST  
2015-08 Emergency Operations | EOP-004-4 EOP-004-4 NBP AB 2 NB

There were 38 sets of responses, including comments from approximately 33 different people from approximately 31 companies representing 8 of the Industry Segments as shown in the table on the following pages.

## Questions

- 1. Do you agree with the SDT's recommended changes to EOP-004-3, Requirements R1 and R2? If you do not agree, or if you agree but have comments or suggestions on the SDT's recommendation, please provide your explanation and suggested language.**
- 2. Do you agree with the proposed revisions to EOP-004-3, Attachment 1? If you do not agree, or if you agree but have comments or suggestions on the SDT's recommendation, please provide your explanation and suggested language.**
- 3. Do you agree with the proposed revisions to EOP-004-3, Attachment 2? If you do not agree, or if you agree but have comments or suggestions on the SDT's recommendation, please provide your explanation and suggested language.**
- 4. Please provide any additional comments you have on the proposed revisions and clarifications to EOP-004-3.**

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
ACES Power Marketing	Brian Van Gheem	6	NA - Not Applicable	ACES Standards Collaborators	Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	1	RF
					Ginger Mercier	Prairie Power, Inc.	1,3	SERC
					Shari Heino	Brazos Electric Power Cooperative, Inc.	1,5	Texas RE
					Tara Lightner	Sunflower Electric Power Corporation	1	SPP RE
					Bill Watson	Old Dominion Electric Cooperative	3,4	SERC
					John Shaver	Arizona Electric Power Cooperative, Inc.	1	WECC
					Michael Brytowski	Great River Energy	1,3,5,6	MRO
					Matt Caves	Western Farmers Electric Cooperative	1,5	SPP RE
					Bill Hutchison	Southern Illinois Power Cooperative	1	SERC
					Kevin Lyons	Central Iowa Power Cooperative	1	MRO
Duke Energy	Colby Bellville	1,3,5,6	FRCC,RF,SERC	Duke Energy	Doug Hils	Duke Energy	1	RF
					Lee Schuster	Duke Energy	3	FRCC
					Dale Goodwine	Duke Energy	5	SERC
					Greg Cecil	Duke Energy	6	RF
Con Ed - Consolidated	Kelly Silver	1	NPCC	Con Edison	Kelly Silver	Con Edison Company of New York	1,3,5,6	NPCC

Edison Co. of New York					Edward Bedder	Orange and Rockland Utilities	NA - Not Applicable	NPCC
Southern Company - Southern Company Services, Inc.	Marsha Morgan	1,3,5,6	SERC	Southern Company	Katherine Prewitt	Southern Company Services, Inc	1	SERC
					Jennifer Sykes	Southern Company Generation and Energy Marketing	6	SERC
					R Scott Moore	Alabama Power Company	3	SERC
					William Shultz	Southern Company Generation	5	SERC
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,10	NPCC	RSC no Dominion	Paul Malozewski	Hydro One.	1	NPCC
					Guy Zito	Northeast Power Coordinating Council	NA - Not Applicable	NPCC
					Randy MacDonald	New Brunswick Power	2	NPCC
					Wayne Sipperly	New York Power Authority	4	NPCC
					David Ramkalawan	Ontario Power Generation	4	NPCC
					Glen Smith	Entergy Services	4	NPCC
					Brian Robinson	Utility Services	5	NPCC
					Bruce Metruck	New York Power Authority	6	NPCC
					Alan Adamson	New York State Reliability Council	7	NPCC
					Edward Bedder	Orange & Rockland Utilities	1	NPCC
					David Burke	UI	3	NPCC
					Michele Tondalo	UI	1	NPCC

					Sylvain Clermont	Hydro Quebec	1	NPCC
					Si Truc Phan	Hydro Quebec	2	NPCC
					Helen Lainis	IESO	2	NPCC
					Laura Mcleod	NB Power	1	NPCC
					Michael Forte	Con Edison	1	NPCC
					Quintin Lee	Eversource Energy	1	NPCC
					Kelly Silver	Con Edison	3	NPCC
					Peter Yost	Con Edison	4	NPCC
					Brian O'Boyle	Con Edison	5	NPCC
					Greg Campoli	NY-ISO	2	NPCC
					Kathleen Goodman	ISO-NE	2	NPCC
					Silvia Parada Mitchell	NextEra Energy, LLC	4	NPCC
					Michael Schiavone	National Grid	1	NPCC
					Michael Jones	National Grid	3	NPCC
Midwest Reliability Organization	Russel Mountjoy	10		MRO NSRF	Joseph DePoorter	Madison Gas & Electric	3,4,5,6	MRO
					Larry Heckert	Alliant Energy	4	MRO
					Amy Casucelli	Xcel Energy	1,3,5,6	MRO
					Chuck Lawrence	American Transmission Company	1	MRO
					Michael Brytowski	Great River Energy	1,3,5,6	MRO
					Jodi Jensen	Western Area Power Administratino	1,6	MRO
					Kayleigh Wilkerson	Lincoln Electric System	1,3,5,6	MRO
					Mahmood Safi	Omaha Public Power District	1,3,5,6	MRO
					Brad Parret	Minnesota Power	1,5	MRO
					Terry Harbour	MidAmerican Energy Company	1,3	MRO

					Tom Breene	Wisconsin Public Service	3,5,6	MRO
					Jeremy Volls	Basin Electric Power Coop	1	MRO
					Kevin Lyons	Central Iowa Power Cooperative	1	MRO
					Mike Morrow	Midcontinent Independent System Operator	2	MRO
Colorado Springs Utilities	Shannon Fair	6		Colorado Springs Utilities	Kaleb Brimhall	Colorado Springs Utilities	5	WECC
					Charlie Morgan	Colorado Springs Utilities	3	WECC
					Shawna Speer	Colorado Springs Utilities	1	WECC
					Shannon Fair	Colorado Springs Utilities	6	WECC
Southwest Power Pool, Inc. (RTO)	Shannon Mickens	2	SPP RE	SPP Standards Review Group	Shannon Mickens	Southwest Power Pool Inc.	2	SPP RE
					James Nail	Independence Power and Light	3	SPP RE
					Tara Lightner	Sunflower Electric	1	SPP RE
					Robert Gray	Board of Public Utilities (BPU) Kansas City, KS	3	SPP RE
					Leo Bernier	AES	NA - Not Applicable	NA - Not Applicable
					Mike Kidwell	Empire District Electric Company	1,3,5	SPP RE
					Sean Simpson	Board of Public Utilities, Kansas City, KS	3	SPP RE

					Tony Eddlement	Nebraska Public Power District	1,3,5	SPP RE
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1. Do you agree with the SDT's recommended changes to EOP-004-3, Requirements R1 and R2? If you do not agree, or if you agree but have comments or suggestions on the SDT's recommendation, please provide your explanation and suggested language.

Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy

Answer No

Document Name

Comment

Duke Energy requests clarification on the addition of "by the later of" and the use of 4pm as the end of a business day. Is it the drafting team's intent that the Responsible Entity has the option of submitting an Event Report 24 hours after the Event threshold has been reached, or the entity may choose to submit the report later than the 24 hours, as long as the report is submitted by 4pm the next business day? The proposed language as currently written may create some ambiguity depending on the reader.

Likes 0

Dislikes 0

Response

Thank you for your comment. The intent is to provide entities at least 24 hours for reporting after recognition of an event; for recognition of reporting events on a weekend or a holiday, it allows the entity up to 4:00 p.m. on their next business day.

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer No

Document Name

Comment

As stated in the comments with the initial ballot, Texas RE noticed there is no requirement specifically indicating how events should be reported. Additionally, the VSLs indicate that a verbal report is acceptable. Since an event reporting form exists, Texas RE recommends the requirements specify the form in Attachment 2 be used for event reporting.

In the Severe VSL for R2 "-4\_ should be added to the last sentence to maintain consistency (e.g. "EOP-004-4").

Likes 0

Dislikes 0

Response

Thank you for your comment. **"Submit EOP-004 Attachment 2 (or DOE-OE-417) pursuant to Requirements R1 and R2"** is stated in Attachment 1 of the standard. The VSL for Requirement R2 has been updated: "The Responsible Entity failed to submit a report for an event in EOP-004-4 Attachment 1."

Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standards Collaborators



<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>(1) We thank the SDT for the development of this draft standard revision and the removal of the administrative burden reflected in Requirement R3 of the current standard. While we generally agree with the results-based compliance approach presented in this draft, we feel that the SDT has an opportunity to further clarify the intentions of their proposed changes.</p> <p>(2) We believe Requirement R2 is intended to provide the Responsible Entity an option of using the criterion that will occur last when reporting. While either criterion will occur "later" from the initial event discovery, as used in the context of an adverb describing a point in time, the ability to select one criterion versus the other is an adjective that describes the criteria's comparison. We recommend using "...by the latter of..." in the requirement text instead.</p> <p>(3) The first criterion listed in Requirement R2 states "24 hours of recognition of meeting an event type threshold for reporting." We believe the SDT inadvertently removed a necessary and supportive phrase that identifies the duration of the criterion. We also believe the SDT failed to establish a starting trigger for this criterion with the recognition and discovery of the event. We recommend rewording the criterion to read "within 24 hours following recognition of meeting an event type threshold for reporting."</p> <p>(4) The second criterion listed in Requirement R2 identifies the end of a business day as 4:00 PM. What is the rationale for selecting an arbitrary time? How do joint-filing entities that operate across large geographic regions and multiple time zones identify the local time? How does a single entity with centralized operations in one time zone identify local time for an event originating in a different time zone? We agree with the SDT's intent to remove ambiguity regarding weekends and holidays, but believe the addition of the 4:00 PM local time reference creates unintended confusion. We recommend removing the reference entirely and allow some flexibility for the Responsible Entity to define its own meaning of "next business day." This would allow smaller entities, with a limited impact on BES reliability, to report after an extended weekend and after becoming fully staffed.</p> <p>(5) To clearly delineate the possible criteria available for Requirement R2, we believe each criterion should be renumbered into individual subparts list.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<p>Thank you for your comment. The intent is to provide entities at least 24 hours for reporting after recognition of an event; for recognition of reporting events on a weekend or a holiday, it allows the entity up to 4:00 p.m. on their next business day (4:00 pm was selected because it is a typical ending time for operating personnel). The recognition of meeting an event type would be the trigger for reporting. It is the intent of the drafting team that the Responsible Entity would report by 4 p.m. of the next business day based on the local time of the entity's centralized location. The Responsible Entity could document this in their event reporting Operating Plan.</p>	
<b>Ryan Buss - Bonneville Power Administration - 1,3,5,6 - WECC</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>BPA believes that the R2 language should only refer to required event reporting to Operating Plan entities (e.g. NERC and/or DOE) within the reporting period.</p>	
Likes	0

Dislikes 0

**Response**

Thank you for your comment. The EOP SDT finds that the Responsible Entity can define who the entities they report are within their event reporting Operating Plan.

**Shannon Fair - Colorado Springs Utilities - 6, Group Name** Colorado Springs Utilities

**Answer** Yes

**Document Name**

**Comment**

The VSLs for R2 need to reflect the change in reporting deadlines to accommodate the reporting entity's next business day

Likes 0

Dislikes 0

**Response**

Thank you for your comment. The EOP SDT has updated the VSLs for Requirement R2.

**Richard Jackson - U.S. Bureau of Reclamation - 1**

**Answer** Yes

**Document Name**

**Comment**

To clarify the Standard pertains to Event Reporting, Reclamation respectfully proposes the following revised language for Standard EOP-004-4, R1, R2, M1, and M2:

R1. : Each Responsible Entity shall have an Event Reporting Operating Plan that includes the protocol(s) for reporting the Reportable Events listed in EOP-004-4 Attachment 1 to the Electric Reliability Organization and other organizations (e.g., the Regional Entity, Responsible Entity personnel, the Responsible Entity's Reliability Coordinator, law enforcement, or governmental authority).

Reclamation suggests re-wording M1 as follows: Each Responsible Entity will have a dated Event Reporting Operating Plan that includes the reporting protocol(s) and name(s) of organization(s) to receive an event report for the Reportable Event(s) specified in EOP-004-4 Attachment 1.

R2. Each Responsible Entity shall report the types of events specified in EOP-004-4 Attachment 1, to the entities specified per its Event Reporting Operating Plan, by the later of 24 hours after recognition of meeting an event type threshold or by the end of the Responsible Entity's next business day, whichever is later (4 p.m. local time will be considered the end of the business day).

M2. Each Responsible Entity will have as evidence of reporting an event either a copy of the completed EOP-004-4 Attachment 2 form or a DOE-OE-417 form and some evidence of submittal (e.g., operator log or other operating documentation, voice recording, electronic mail message, or confirmation of facsimile) demonstrating the event report was submitted within the timeframes identified in R2 above.

Reclamation suggests the following change to both R2 and M2: "by the later of 24 hours after recognition of meeting an event type..."

Likes 0

Dislikes 0

**Response**

Thank you for your comments. The EOP SDT finds the language in Requirement R1 and Measure M1 is clear as written and it does not require the specifics you are asking for in your suggested language.

Thank you for your comment. The intent is to provide entities at least 24 hours for reporting after recognition of an event; for recognition of reporting events on a weekend or a holiday, it allows the entity up to 4:00 p.m. on their next business day. The recognition of meeting an event type would be the trigger for reporting. It is the intent of the drafting team that the Responsible Entity would report by 4 p.m. of the next business day based on the local time of the entity’s centralized location. The Responsible Entity could document this in their event reporting Operating Plan.

**Russel Mountjoy - Midwest Reliability Organization - 10, Group Name MRO NSRF**

**Answer**

Yes

**Document Name**

**Comment**

The NSRF would like to thank the Standard Drafting Team (SDT) for their thoughtful changes and believes the revisions proposed are valuable. Please see question two for concerns that we have.

Likes 0

Dislikes 0

**Response**

Thank you for your support. Please see responses to Question 2.

**Michelle Amarantos - APS - Arizona Public Service Co. - 1**

**Answer**

Yes

**Document Name**

**Comment**

With regard to requirement R2, AZPS recommends modifying the text for clarity to read as “the later of 24 hours following recognition of meeting an event type” as opposed to “the later of 24 hours of recognition of meeting an event type.”

Likes 0

Dislikes 0

**Response**

Thank you for your comment. The intent is to provide entities at least 24 hours for reporting after recognition of an event; for recognition of reporting events on a weekend or a holiday, it allows the entity up to 4:00 p.m. on their next business day. The recognition of meeting an event type would be the trigger for reporting. It is the intent of the drafting team that the Responsible Entity would report by 4 p.m. of

the next business day based on the local time of the entity's centralized location. The Responsible Entity could document this in their event reporting Operating Plan.

**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group**

**Answer** Yes

**Document Name**

**Comment**

As for Requirement R1, we have no concerns pertaining to the proposed changes. However, we feel the clarity notes applicable to Measurement M1 in the comment form are inaccurate (page 2). The notes mentions the correction to the version number however, it doesn't mention the phrase "**but is not limited to the**" being stricken from the standard. We suggest the drafting team update all applicable documents to reflect that change.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. The EOP SDT has updated the Mapping Document.

**sean erickson - Western Area Power Administration - 1**

**Answer** Yes

**Document Name**

**Comment**

WAPA appreciates the efforts of the Standards Drafting Team (SDT) and welcomes the changes.

Likes 0

Dislikes 0

**Response**

Thank you for your support.

**Jeffrey DePriest - DTE Energy - Detroit Edison Company - 5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Karl Blaszkowski - CMS Energy - Consumers Energy Company - 3**

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

**Karl Blaszkowski - CMS Energy - Consumers Energy Company - 3**

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

**Preston Walker - PJM Interconnection, L.L.C. - 2 - SERC,RF**

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

**Thomas Foltz - AEP - 5**

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

**Response**

**Glen Farmer - Avista - Avista Corporation - 1,3,5**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Andrew Pusztai - Andrew Pusztai**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Si Truc Phan - Hydro-Quebec TransEnergie - 1 - NPCC**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Michael Watkins - Michael Watkins On Behalf of: Pawel Krupa, Seattle City Light, 1, 4, 5, 6, 3; - Michael Watkins**

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

**Michael Watkins - Michael Watkins On Behalf of: Pawel Krupa, Seattle City Light, 1, 4, 5, 6, 3; - Michael Watkins**

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

**Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC**

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

**Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company**

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

**Response**

**Sing Tay - Sing Tay On Behalf of: Donald Hargrove, OGE Energy - Oklahoma Gas and Electric Co., 3, 1, 6, 5; - Sing Tay**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Laura Nelson - IDACORP - Idaho Power Company - 1**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Jerome Gobby - Sempra - San Diego Gas and Electric - 5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Ryan Olson - Portland General Electric Co. - 5**



Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
<b>Response</b>	
Ryan Olson - Portland General Electric Co. - 5	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
<b>Response</b>	
Michael Cruz-Montes - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
<b>Response</b>	
Jamison Cawley - Nebraska Public Power District - 1	
Answer	Yes
Document Name	
Comment	
Likes	0

Dislikes 0

**Response**

**Joshua Smith - Joshua Smith On Behalf of: Lee Maurer, Oncor Electric Delivery, 1; - Joshua Smith**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Tony Eddleman - Nebraska Public Power District - 3**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Mike Beuthling - Mike Beuthling On Behalf of: Payam Farahbakhsh, Hydro One Networks, Inc., 1, 3; - Mike Beuthling**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,10 - NPCC, Group Name RSC no Dominion**

**Answer** Yes

<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Elizabeth Axson - Electric Reliability Council of Texas, Inc. - 2</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Michael Watkins - Michael Watkins On Behalf of: Pawel Krupa, Seattle City Light, 1, 4, 5, 6, 3; - Michael Watkins</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Michael Watkins - Michael Watkins On Behalf of: Pawel Krupa, Seattle City Light, 1, 4, 5, 6, 3; - Michael Watkins</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	

**Response**

2. Do you agree with the proposed revisions to EOP-004-3, Attachment 1? If you do not agree, or if you agree but have comments or suggestions on the SDT's recommendation, please provide your explanation and suggested language.

Elizabeth Axson - Electric Reliability Council of Texas, Inc. - 2

Answer No

Document Name ERO\_EAP\_Documents DL-Justification\_for\_Event\_Category\_1g\_and\_3a\_changes\_for ERCOT.pdf

**Comment**

ERCOT appreciates the SDT revising the generation loss reporting threshold for the ERCOT Interconnection to 1,400 MW from 1,000 MW in Attachment 1 of EOP-004. This change is consistent with ERCOT's September 8, 2016 comments, which requested this revision to align the reporting threshold with the *ERO Event Analysis Process* (EAP) document's threshold for initiating an analysis of a Category 3a generation loss event in the ERCOT Interconnection, which, at the time of ERCOT's comment, was 1,400 MW.

However, concurrent with Project 2015-08, the NERC Event Analysis Subcommittee (EAS) proposed changes to the EAP document that, among other things, sought to standardize the event analysis threshold for all Interconnections—including ERCOT—at 2,000 MW. The draft EAP document was first posted for comment on the NERC website on September 30, 2016, some three weeks after ERCOT submitted its comments to the latest version of EOP-004. The revised EAP document—version 3.1—was ultimately approved by the NERC Operating Committee at its December 13, 2016 meeting and became effective January 1, 2017. Thus, the threshold for conducting an analysis of Category 3a events is now 2,000 MW.

Consistent with ERCOT's September 8 comments and with the SDT's change to the reporting threshold in the last version of the draft standard, ERCOT believes the threshold for generation loss reporting in EOP-004 should continue to align with the EAP document's threshold for analysis of Category 3a events, which is now 2,000 MW. If there are any reasons for differentiating between the two thresholds, this justification does not seem immediately obvious. Fundamentally, in ERCOT's view, it would make little sense to require development of a written report of a generation loss event and distribute it to various entities if the event did not also justify an analysis under the EAP process. Furthermore, the reasons cited by the EAS for increasing the event analysis threshold—the implementation of BAL-003-1.1 and BAL-001-TRE-01, and the procurement of greater quantities of responsive reserve in ERCOT, among other reasons—would also appear to justify increasing the event reporting threshold. See *Justification for Proposed Changes to the ERO Event Analysis Process Categories 1g and 3a* (attached).

In conclusion, ERCOT appreciates the SDT's recognition of the need to align the EOP-004 generation loss reporting threshold with the EAP document's generation loss event analysis threshold and asks the SDT to continue this alignment by setting the generation loss reporting threshold for the ERCOT Interconnection in EOP-004 Attachment 1 to 2,000 MW.

Likes 0

Dislikes 0

**Response**

Thank you for your comments. To establish the equitable criteria for reporting in the ERCOT interconnection, the EOP SDT has revised the reporting threshold from 1,000 MW to 1,400 MW for generation loss in the ERCOT interconnection, as recommended from the September comments. Please refer to the project's mapping document for the technical justification regarding this revision. The intent of the EAP is to be used to promote a structured and consistent approach to performing event analyses in North America, it is a process for addressing event analysis and provides a lessons learned process and facilitates communication and information exchange among

registered entities, NERC and its Regional Entities; it is a voluntary data-gathering tool; whereas the proposed Reliability Standard EOP-004-4 is mandatory. The EOP SDT collaborated with both the Events Analysis Subcommittee, as well as the United States Department of Energy, to better align reporting requirements of EOP-004, the EAP, and the OE-417. The reporting threshold for generation loss in the ERCOT Interconnection in proposed EOP-004-4 is aligned with the DOE OE-417.

**Ryan Buss - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer** No

**Document Name**

**Comment**

BPA believes that the BA or TOP could be the initiating parties for a load appeal. Also, more clarity should be added for automatic load shedding causes (UVLS, UFLS, RAS).

Likes 0

Dislikes 0

**Response**

Thank you for your comments. EOP-011-1 puts the responsibility of having public appeals for load reduction in the BA's Operating Plan to Mitigate Capacity Emergencies and Energy Emergencies; therefore, it should only be the BA reporting this event type in EOP-004. The EOP SDT feels that the Threshold for Reporting is clear, the Responsible Reporting Entity will know if the Firm load shedding was done either manually, automatically or a combination of both.

**Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,10 - NPCC, Group Name RSC no Dominion**

**Answer** No

**Document Name**

**Comment**

For the "Complete loss of monitoring or control capability at its staffed BES control center" Event Type, the "Threshold for Reporting" column should be revised as follows: "Complete loss of monitoring or control capability at its staffed BES control center for 30 continuous minutes or more, such that analysis capability (i.e., State Estimator or Contingency Analysis) is rendered inoperable." The "Threshold for Reporting" language should continue to include the "such that [...]" language to maintain consistency with the EAP.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. The EOP SDT has discussed your comment but finds that the Event Type and Threshold for Reporting are clear as written.

**Rachel Coyne - Texas Reliability Entity, Inc. - 10**

**Answer** No

**Document Name****Comment**

Texas RE appreciates the SDT's response to Texas RE's previous comments regarding the removal of the IROLTV reporting obligation. As the SDT noted in its response, the SDT removed the reporting requirement because the new TOP-001-3 R12 requirement requires registered entities to avoid exceeding IROLs for the relevant TV period. As such, the SDT reasons that entities will self-report any noncompliance and there is no need to retain the corresponding reporting requirement.

Texas RE sees two issues with the SDT's rationale. First, as Texas RE noted in its original comments, there is a significant difference in the purpose and timing of the EOP-004 reporting requirements and the substantive obligations set forth under the new TOP-001-3, R12. Texas RE noted: "While such an exceedance may be investigated in the compliance or enforcement process, there is necessarily a delay in these activities. The contemporaneous reporting obligations serve to ensure that the NERC regions have immediate knowledge that a significant risk of a cascading outage has occurred, permitting the region to begin steps to identify the root cause and develop appropriate mitigation. Because such awareness appears critical to the core reliability functions performed within the NERC regions, Texas RE cautions against eliminating this requirement." Simply put, the mere existence of a parallel substantive requirement does not address Texas RE's concern. Texas RE cannot support the elimination of the IROLTV reporting obligation based on the SDT's proffered rationale.

Second, the SDT appears to misunderstand the self-reporting process. Principally, entities are under no obligation to self-report potential noncompliance instances, and may elect not to do so at their sole discretion. Given that certain utilities are on three- or even six-year audit cycles, an entity could decline to self-report an IROL exceedance violating TOP-001-3, R12 and wait until its next scheduled audit (contingent on the requirement being included in the audit scope). Accordingly, a potential issue could linger for years before it is addressed in the enforcement process. This is precisely the reason Texas RE believes the contemporaneous reporting requirement continues to be a necessary part of the NERC Reliability Standards.

Texas RE also suggests the Standard is too narrow in its reporting requirements for events. According to the Events Analysis Process effective January 1, 2017, "The primary reason for participating in an event analysis is to determine if there are lessons to be learned and shared with the industry. The analysis process involves identifying what happened, why it happened, and what can be done to prevent reoccurrence." Texas RE recommends broadening the requirements in order to understand prevention as well as what took place when event actually occurred. Texas RE provides the following suggestions for broadening the reporting requirements.

- Public appeal for load reduction should not be limited to a BES Emergency. In some cases the appeal may be done to avoid a BES Emergency and that event should be evaluated per the Events Analysis Process in order to prevent issues from occurring in the future.
- As previously submitted in comments with the initial ballot, Texas RE recommends adding the TOP function to the public appeal event type. This will align and be consistent with EOP-001-2.1b Requirement R2, which requires a TOP to "Develop, maintain, and implement a set of plans for load shedding", EOP-001-2.1b Requirement R3, which requires a TOP emergency plan to include "Load reduction", and EOP-001-2.1b Requirement R4, which references elements in Attachment 1-EOP-001 that a TOP and BA should consider when developing emergency plans.
- For the event types, "Complete loss of monitoring or control capability at its staffed BES control center" and "Complete loss of Interpersonal Communications and Alternative Interpersonal Communication capability at its staffed BES control center", Texas RE recommends removing

“its staffed”. Loss of monitoring or control capability is just as important at a non-staffed site as it is a staffed site and there should be no distinction in staffing status. Understanding why complete loss of monitoring or control capability and complete loss of Interpersonal and Alternative Interpersonal Communications occurred will increase the likelihood of prevention in the future.

Reliability Standard EOP-004-2 does not take into account GOP Control Centers. As previously stated, Texas RE recommends adding the GOP to the entity with reporting responsibility. Reliability Standard CIP-002-5 states that “each Control Center or back up Control Center used to perform the functional obligations of the Generator Operator” (CIP-002-5, Attachment 1, Sections 1.4 and 2.11) should be considered in an entity’s identification of high and medium BES Cyber Systems. Reliability Standard CIP-008-5 Requirement 1 requires Responsible Entities with High and Medium Impact BES Cyber Systems (which could include GOP Control Centers) to have a process to determine if a Cyber Security Incident is reportable and noticed the E-ISAC. Since this includes GOP Controls Centers, it would be consistent to include GOP Control Centers in EOP-004-4. Also, there are several GOPs in Texas (and other regions) that may control more megawatts than some BAs and yet there is no requirement to report events that occur so they are studied and preventative measures are taken in the future. Since CIP-002-5 has a mechanism for considering GOP Control Centers, and there are several GOP Control Centers that may control as much or more generation than a BA, Texas RE recommends adding the GOP as an entity with reporting responsibility. From a consistency and reliability stand point, events that occur at a GOP Control Center should be reported on and evaluated.

Likes 0

Dislikes 0

### Response

Thank you for your comments.

The EOP SDT has discussed your concerns and still contends that IROL reporting should be removed from this standard. TOP-001-3, Requirement R12 becomes effective 4/1/17, requiring a self-report if Tv is exceeded; TOP-007-WECC-1 is pending retirement; IRO-009-2, Requirement R3, requires the RC to act or direct others to act until the IROL exceedance is mitigated with in the IROL’s Tv. The EAP also lists Category 2 “...g.) Interconnection Reliability Operating Limit (IROL) Violation for the time greater than Tv.” EOP-004 is not the proper vehicle for immediate reporting. The drafting team suggests following the standard development process of submitting a SAR for modification.

The purpose of the EAP is to be used to promote a structured and consistent approach to performing event analyses in North America, it is a process for addressing event analysis and provides a lessons learned process and facilitates communication and information exchange among registered entities, NERC and its Regional Entities; it is a voluntary, data-gathering tool; whereas the proposed Reliability Standard EOP-004-4 is mandatory. The EOP SDT collaborated with both the Events Analysis Subcommittee, as well as the United States Department of Energy, to better align reporting requirements of EOP-004, the EAP, and the OE-417.

Public appeal for load reduction in a BES Emergency is in the currently-enforced EOP-004 standard, the EOP SDT finds the Event Type is appropriate as written.

In Reliability Standard EOP-011-1 (subject to future enforcement, retires EOP-001-2.1b, EOP-002-3.1, and EOP-003-2), Requirement R2, it is the function of the BA to include within its RC-reviewed Operating Plan to mitigate Capacity Emergencies and Energy Emergencies public appeals for voluntary load reductions (Requirement R2, Part 2.2.4.). The BA is the proper Entity with reporting responsibility for public appeal for load reduction resulting in a BES Emergency.



The EOP SDT team reviewed your comment about removing “its staffed” related to monitoring or control and Interpersonal/Alternative Interpersonal Communications. The team held many discussion on this topic related to staffed or not staffed; and, yes, it is important to the capability there, but if the site is not staffed the responsible entity will not be aware of the issue plus if you are not actively operating from the site there is no impact on reliability. The team is sure once the issues are identified the Responsible Entity will resolve the situation.

The EOP SDT reviewed the defined term for Control Center (effective 7/1/2016 as identified in CIP standards) and GOP is included in this definition. The defined term is not applicable, given that the GOPs were not originally identified in Attachment 1 or Attachment 2 as an entity with reporting responsibilities for control center event types. Although the GOPs have other reporting responsibilities, they have no event reporting responsibility for control center event types. There is also not a currently-enforced standard that requires GOPs to have Control Centers or backup Control Centers.

**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name** SPP Standards Review Group

**Answer** No

**Document Name**

**Comment**

We suggest that the Event Type “**Transmission Loss**” in Attachment 1 be removed from this section of the document. We feel that this effort is redundant and has been addressed in the NERC Event Analysis Program. Our first example would be applicable to, the renewable generation such as wind farms would require reporting for the loss of three or more generators pertain to a Misoperations. Another example would be, the slow trip of a circuit breaker clearing three or more transmission lines would be reportable even if it didn’t include a Misoperations.

Likes 0

Dislikes 0

**Response**

The SDT appreciates your comment regarding Transmission Loss in Attachment 1. The drafting team is comprised of industry SMEs, NERC SMEs, and FERC observers, and the EOP SDT has conducted many discussions on this issue as a result of industry comments received; but finds that there remains a need for this reporting requirement. Transmission Loss event type in Attachment 1 closely aligns with the EAP.

The previous draft revision from “Elements” to “Facilities” was to align with the EAP. Some examples can be found on the NERC website for Event Analysis Program; specifically, Addendum for Category 1a Events. If further examples or questions arise, contact your Regional Entity.

The EOP SDT collaborated with both the Events Analysis Subcommittee, as well as the United States Department of Energy, to better align reporting requirements of EOP-004, the EAP, and the OE-417. The intent of the EAP is to be used to promote a structured and consistent approach to performing event analyses in North America, it is a process for addressing event analysis and provides a lessons learned process and facilitates communication and information exchange among registered entities, NERC and its Regional Entities; it is a voluntary data-gathering tool; whereas the proposed Reliability Standard EOP-004-4 is mandatory.

**Tony Eddleman - Nebraska Public Power District - 3**

**Answer**

No

**Document Name**

**Comment**

In Attachment 1, the Event Type, “Transmission loss” should be eliminated from mandatory reporting. Events reported under this category are included in voluntary reporting under the NERC Event Analysis Program and this minimum impact level of events should not be included in mandatory compliance reporting subject to fines and penalties. This category includes BES Facilities experiencing unexpected loss, contrary to design, of three or more BES Facilities. Facilities are defined as: A set of electrical equipment that operates as a single Bulk Electric System Element (e.g., a line, a generator, a shunt compensator, transformer, etc.). The following examples support removal of this Event Type:

1. Renewable generation, such as wind farms, with total generation >75MWs are included in BES Facilities. A misoperation on a feeder at a wind facility including three (3) or more generators would require a mandatory report under EOP-004-4. A typical wind farm generator is approximately 1.5 – 3.0 MWs each. So, under Transmission loss, a generation loss of less than 10 MWs is required to be reported, but under the “Generation loss” Event Type in Attachment 1 to EOP-004-4, the reportable generation loss would need to be greater than 2,000 MWs (Eastern Interconnection) to be subject to mandatory fines and penalties. 10 MWs versus 2,000 MWs is an obvious disparity and clearly shows the minimal level of impact to reliability of the BES is not met.
2. Under “Transmission loss”, a slow trip of a circuit breaker clearing a bus with 3 or more transmission lines or transformers, or generators, would be reportable under this mandatory compliance obligation and subject to fines and penalties. This can happen even without a misoperation, if the circuit breaker is merely slow in clearing the fault and the backup protection on the breaker clears the bus. All the protection systems can operate correctly and an entity is still subject to reporting under this event type. These types of events are being collected under the NERC Event Analysis Program and these events do not meet the threshold of risk to the BES to enforce fines and penalties. More significant “Transmission loss” events are included in other Event Types and associated with BES Emergencies. Minor risk “Transmission loss” events are more appropriately handled through the voluntary NERC Event Analysis Program and do not need to be included in EOP-004 reporting. The risk of these minor events does not translate to a significant risk to the BES and does not need to be included in mandatory compliance and enforcement.
3. Under “transmission loss”, misoperations involving 3 or more Transmission lines, transformers, or generators are reportable under EOP-004-4. Misoperation reporting is mandatory under PRC-004. Redundant reporting under EOP-004 is not needed and subjects entities to double jeopardy for compliance violations.
4. The NERC Event Analysis Program has matured over the past few years and is an excellent tool for industry to review, discuss, and develop lessons learned to improve reliability. Compliance obligations under the event type “Transmission loss” are no longer needed and are a detriment to reliability by taking the operational focus away from operation of the BES during these minor events to reporting when these reporting requirements are better handled through other existing programs.

Likes 0

Dislikes 0

**Response**

The SDT appreciates your comment regarding Transmission Loss in Attachment 1. The drafting team is comprised of industry SMEs, NERC SMEs, and FERC observers, and the EOP SDT has conducted many discussions on this issue as a result of industry comments received; but finds that there remains a need for this reporting requirement. Transmission Loss event type in Attachment 1 closely aligns with the EAP.

The previous draft revision from “Elements” to “Facilities” was to align with the EAP. Some examples can be found on the NERC website for Event Analysis Program; specifically, Addendum for Category 1a Events. If further examples or questions arise, contact your Regional Entity.

The EOP SDT collaborated with both the Events Analysis Subcommittee, as well as the United States Department of Energy, to better align reporting requirements of EOP-004, the EAP, and the OE-417. The intent of the EAP is to be used to promote a structured and consistent approach to performing event analyses in North America, it is a process for addressing event analysis and provides a lessons learned process and facilitates communication and information exchange among registered entities, NERC and its Regional Entities; it is a voluntary data-gathering tool; whereas the proposed Reliability Standard EOP-004-4 is mandatory.

**Jamison Cawley - Nebraska Public Power District - 1**

<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	

In Attachment 1, the Event Type, “Transmission loss” should be eliminated from mandatory reporting. Events reported under this category are included in voluntary reporting under the NERC Event Analysis Program and this minimum impact level of events should not be included in mandatory compliance reporting subject to fines and penalties. This category includes BES Facilities experiencing unexpected loss, contrary to design, of three or more BES Facilities. Facilities are defined as: A set of electrical equipment that operates as a single Bulk Electric System Element (e.g., a line, a generator, a shunt compensator, transformer, etc.). The following examples support removal of this Event Type:

1. Renewable generation, such as wind farms, with total generation >75MWs are included in BES Facilities. A misoperation on a feeder at a wind facility including three (3) or more generators would require a mandatory report under EOP-004-4. A typical wind farm generator is approximately 1.5 – 3.0 MWs each. So, under Transmission loss, a generation loss of less than 10 MWs is required to be reported, but under the “Generation loss” Event Type in Attachment 1 to EOP-004-4, the reportable generation loss would need to be greater than 2,000 MWs (Eastern Interconnection) to be subject to mandatory fines and penalties. 10 MWs versus 2,000 MWs is an obvious disparity and clearly shows the minimal level of impact to reliability of the BES is not met.
2. Under “Transmission loss”, a slow trip of a circuit breaker clearing a bus with 3 or more transmission lines or transformers, or generators, would be reportable under this mandatory compliance obligation and subject to fines and penalties. This can happen even without a misoperation, if the circuit breaker is merely slow in clearing the fault and the backup protection on the breaker clears the bus. All the protection systems can operate correctly and an entity is still subject to reporting under this event type. These types of events are being collected under the NERC Event Analysis Program and these events do not meet the threshold of risk to the BES to enforce fines and penalties. More significant “Transmission loss” events are included in other Event Types and associated with BES Emergencies. Minor risk “Transmission loss” events are more appropriately handled through the voluntary NERC Event Analysis Program and do not need to be included in EOP-004 reporting. The risk of these minor events does not translate to a significant risk to the BES and does not need to be included in mandatory compliance and enforcement.
3. Under “transmission loss”, misoperations involving 3 or more Transmission lines, transformers, or generators are reportable under EOP-004-4. Misoperation reporting is mandatory under PRC-004. Redundant reporting under EOP-004 is not needed and subjects entities to double jeopardy for compliance violations.
4. The NERC Event Analysis Program has matured over the past few years and is an excellent tool for industry to review, discuss, and develop lessons learned to improve reliability. Compliance obligations under the event type “Transmission loss” are no longer needed and are a detriment to reliability by taking the operational focus away from operation of the BES during these minor events to reporting when these reporting requirements are better handled through other existing programs.

Likes 0

Dislikes 0

**Response**

The SDT appreciates your comment regarding Transmission Loss in Attachment 1. The drafting team is comprised of industry SMEs, NERC SMEs, and FERC observers, and the EOP SDT has conducted many discussions on this issue as a result of industry comments received; but finds that there remains a need for this reporting requirement. Transmission Loss event type in Attachment 1 closely aligns with the EAP.

The previous draft revision from “Elements” to “Facilities” was to align with the EAP. Some examples can be found on the NERC website for Event Analysis Program; specifically, Addendum for Category 1a Events. If further examples or questions arise, contact your Regional Entity.

The EOP SDT collaborated with both the Events Analysis Subcommittee, as well as the United States Department of Energy, to better align reporting requirements of EOP-004, the EAP, and the OE-417. The intent of the EAP is to be used to promote a structured and consistent approach to performing event analyses in North America, it is a process for addressing event analysis and provides a lessons learned process and facilitates communication and information exchange among registered entities, NERC and its Regional Entities; it is a voluntary data-gathering tool; whereas the proposed Reliability Standard EOP-004-4 is mandatory.

**Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy**

**Answer**

No

**Document Name**

**Comment**

Duke Energy recommends the following edits to Event Types in Attachment 1:

- &bull; Public appeal for load reduction
- &bull; Firm load shedding

We recommend the removal of the phrase “resulting from a BES Emergency” from the Event Type, and placing the phrase in the Threshold for Reporting.

Duke Energy recommends the following edits to Threshold for Reporting in Attachment 1:

- &bull; Public appeal for load reduction resulting from a BES Emergency.
- &bull; System-wide voltage reduction of 3% or more resulting from a BES Emergency.
- &bull; Firm load shedding &ge; 100 MW (manual or automatic) resulting from a BES Emergency.

We recommend the removal of the of the phrase “to maintain continuity of the BES” and replacing with the more widely understood “resulting from a BES Emergency”. We feel that adding “resulting from a BES Emergency” to the “Threshold for Reporting” in both cases consistently creates a better understanding and is less vague. By doing this, it puts the details in the “Threshold for Reporting” language where we feel they are best suited. Additionally, while we understand the phrase “to maintain continuity of the BES” would mirror the reference used in OE-417, that doesn’t mean that the phrase is any less ambiguous or clearly understood throughout the industry. With BES Emergency being a defined term, and readily used throughout the industry, we believe it better suited than the less known, undefined concept of “to maintain continuity of the BES”.

Firm load shedding resulting from a BES Emergency:

We recommend the drafting team consider adding “or” to the “Entity with Reporting Responsibility” section for this Event Type. We suggest the following: “*Initiating RC, BA, or TOP*”. We feel that the addition of “or” furthers the drafting team’s intent that only one of the listed entities is expected to file the report. As written, one could still read the language as to state that all entities are required to file a report rather than just the initiating entity.

Likes 0

Dislikes 0

### Response

Thank you for your comment. The EOP SDT reviewed your comments and agreed with your suggested changes to System-wide voltage reduction and updated the Event Type category and the Threshold. The EOP SDT agrees with your comment to add ‘or’ between BA and TOP, it adds clarity to the Entity with Reporting Responsibility. For consistency with Attachment 1 Event Types, and identifying that a BES Emergency has occurred and that an action has taken place, no change was made to Event Type category for public appeal and firm load shedding.

**Kelly Silver - Con Ed - Consolidated Edison Co. of New York - 1, Group Name** Con Edison

**Answer**

No

**Document Name**

### Comment

For the “Complete loss of monitoring or control capability at its staffed BES control center” Event Type, the “Threshold for Reporting” column should be revised as follows: “Complete loss of monitoring or control capability at its staffed BES control center for 30 continuous minutes or more, **such that analysis capability (i.e., State Estimator or Contingency Analysis) is rendered inoperable.**” The “Threshold for Reporting” language should continue to include the “such that[...].” language to maintain consistency with the EAP.

Likes 0

Dislikes 0

### Response

Thank you for your comment. The EOP SDT feels that complete loss of monitoring or control capability at its staffed BES control center is clear as written and does not need “such that analysis capability (i.e., State Estimator or Contingency Analysis) added. This was discussed at length at many drafting team meetings and the “such that analysis capability (i.e., State Estimator or Contingency Analysis)” language did not bring any clarity to the reporting trigger.

**Sing Tay - Sing Tay On Behalf of: Donald Hargrove, OGE Energy - Oklahoma Gas and Electric Co., 3, 1, 6, 5; - Sing Tay**

**Answer**

No

**Document Name**

### Comment

Regarding the Event Type “Transmission Loss” in Attachment 1, we suggest that the SDT consider one of the following options:

**1. Modify the threshold language as follows:**

“Unexpected loss within its area, contrary to design, of three or more BES Transmission elements caused by a common disturbance (excluding successful automatic reclosing).”

Reasons:

- a. The current NERC Glossary of Terms definition of “Facilities” includes generators. Therefore, renewable generation such as wind farms would require reporting for the loss of three or more generators. This loss in MW is minimal compared to the threshold stated in the Event Type “Generation loss”.
- b. Generation loss is required to be reported by the BA. Including generation in the reporting requirements for the TOP as well introduces confusion and the possibility of unnecessary or duplicative reporting.

OR

**2. Remove this event type from this section of the document.**

Reasons:

- a. Same reasons as listed above
- b. This reporting is redundant having already been addressed in the NERC Event Analysis Program.

Likes 0

Dislikes 0

**Response**

The SDT appreciates your comment regarding Transmission Loss in Attachment 1. The drafting team is comprised of industry SMEs, NERC SMEs, and FERC observers, and the EOP SDT has conducted many discussions on this issue as a result of industry comments received; but finds that there remains a need for this reporting requirement. Transmission Loss event type in Attachment 1 closely aligns with the EAP.

The previous draft revision from “Elements” to “Facilities” was to align with the EAP. Some examples can be found on the NERC website for Event Analysis Program; specifically, Addendum for Category 1a Events. If further examples or questions arise, contact your Regional Entity.

The EOP SDT collaborated with both the Events Analysis Subcommittee, as well as the United States Department of Energy, to better align reporting requirements of EOP-004, the EAP, and the OE-417. The intent of the EAP is to be used to promote a structured and consistent approach to performing event analyses in North America, it is a process for addressing event analysis and provides a lessons learned process and facilitates communication and information exchange among registered entities, NERC and its Regional Entities; it is a voluntary data-gathering tool; whereas the proposed Reliability Standard EOP-004-4 is mandatory.

**Don Schmit - Nebraska Public Power District - 5**

**Answer**

No

**Document Name**

**Comment**

In Attachment 1, the Event Type, “Transmission loss” should be eliminated from mandatory reporting. Events reported under this category are included in voluntary reporting under the NERC Event Analysis Program and this minimum impact level of events should not be included in mandatory compliance reporting subject to fines and penalties. This category includes BES Facilities experiencing unexpected loss, contrary to design, of three or more BES Facilities. Facilities are defined as: A set of electrical equipment that operates as a single Bulk Electric System Element (e.g., a line, a generator, a shunt compensator, transformer, etc.). The following examples support removal of this Event Type:

1. Renewable generation, such as wind farms, with total generation >75MWs are included in BES Facilities. A misoperation on a feeder at a wind facility including three (3) or more generators would require a mandatory report under EOP-004-4. A typical wind farm generator is approximately 1.5 – 3.0 MWs each. So, under Transmission loss, a generation loss of less than 10 MWs is required to be reported, but under the “Generation loss” Event Type in Attachment 1 to EOP-004-4, the reportable generation loss would need to be greater than 2,000 MWs (Eastern Interconnection) to be subject to mandatory fines and penalties. 10 MWs versus 2,000 MWs is an obvious disparity and clearly shows the minimal level of impact to reliability of the BES is not met.
2. Under “Transmission loss”, a slow trip of a circuit breaker clearing a bus with 3 or more transmission lines or transformers, or generators, would be reportable under this mandatory compliance obligation and subject to fines and penalties. This can happen even without a misoperation, if the circuit breaker is merely slow in clearing the fault and the backup protection on the breaker clears the bus. All the protection systems can operate correctly and an entity is still subject to reporting under this event type. These types of events are being collected under the NERC Event Analysis Program and these events do not meet the threshold of risk to the BES to enforce fines and penalties. More significant “Transmission loss” events are included in other Event Types and associated with BES Emergencies. Minor risk “Transmission loss” events are more appropriately handled through the voluntary NERC Event Analysis Program and do not need to be included in EOP-004 reporting. The risk of these minor events does not translate to a significant risk to the BES and does not need to be included in mandatory compliance and enforcement.
3. Under “transmission loss”, misoperations involving 3 or more Transmission lines, transformers, or generators are reportable under EOP-004-4. Misoperation reporting is mandatory under PRC-004. Redundant reporting under EOP-004 is not needed and subjects entities to double jeopardy for compliance violations.
4. The NERC Event Analysis Program has matured over the past few years and is an excellent tool for industry to review, discuss, and develop lessons learned to improve reliability. Compliance obligations under the event type “Transmission loss” are no longer needed and are a detriment to reliability by taking the operational focus away from operation of the BES during these minor events to reporting when these reporting requirements are better handled through other existing programs.

Likes 0

Dislikes 0

### Response

The SDT appreciates your comment regarding Transmission Loss in Attachment 1. The drafting team is comprised of industry SMEs, NERC SMEs, and FERC observers, and the EOP SDT has conducted many discussions on this issue as a result of industry comments received; but finds that there remains a need for this reporting requirement. Transmission Loss event type in Attachment 1 closely aligns with the EAP.

The previous draft revision from “Elements” to “Facilities” was to align with the EAP. Some examples can be found on the NERC website for Event Analysis Program; specifically, Addendum for Category 1a Events. If further examples or questions arise, contact your Regional Entity.

The EOP SDT collaborated with both the Events Analysis Subcommittee, as well as the United States Department of Energy, to better align reporting requirements of EOP-004, the EAP, and the OE-417. The intent of the EAP is to be used to promote a structured and consistent approach to performing event analyses in North America, it is a process for addressing event analysis and provides a lessons learned

process and facilitates communication and information exchange among registered entities, NERC and its Regional Entities; it is a voluntary data-gathering tool; whereas the proposed Reliability Standard EOP-004-4 is mandatory.

**Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company**

**Answer** No

**Document Name**

**Comment**

Comments: Attachment 1, Page 10, 1st Row: Event Type: **BES Emergency resulting in voltage deviation on a Facility** – The voltage deviation range, as described in “Threshold for Reporting,” includes everything greater than -10% of nominal voltage which includes acceptable voltages. (e.g. For 115.0kV, everything greater than -10% would include 103.5 to 126.4kV)

**Suggested Language for “Threshold for Reporting”:** A voltage deviation of < -10% OR > 10% of nominal voltage sustained for > 15 continuous minutes.

Likes 0

Dislikes 0

**Response**

The EOP SDT appreciates you comment about the voltage reporting requirement in the Threshold for Reporting and will change the language to “A voltage deviation of  $\geq$  10% of nominal voltage sustained for > 15 continuous minutes.”

**Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC**

**Answer** No

**Document Name**

**Comment**

At times there may be a need for a TOP to implement a public appeal for load reduction in certain areas of their system if there is a system operating limit that can only be controlled by reduced load. We recommend replacing “BA” with “Initiating BA or TOP.”

The event types with multiple applicable entities such as, “Uncontrolled loss of firm load resulting from a BES Emergency”, and “System separation (islanding)” will most likely have the same event reported multiple times if the BA, TOP or RC are different entities. This has in the past been a source of confusion with the same event being reported multiple times. We recommend changing the Entity with Reporting Responsibility for the Event Type, “Uncontrolled loss of firm load resulting from a BES Emergency” to just the BA. We recommend changing the Entity with Reporting Responsibility for the Event Type, “System separation (islanding)” to just the BA. This would eliminate multiple reports for the same event, while still making sure the events are reported.

Likes 0

Dislikes 0

**Response**



Thank you for your comments. Reliability Standard EOP-011-1 (subject to future enforcement) puts the responsibility of having Public Appeals for load reduction in the BA's Operating Plan to Mitigate Capacity Emergencies and Energy Emergencies; therefore, it should only be the BA reporting this event type in EOP-004.

If an event applies to any of the entities listed as the "entities with reporting responsibilities," then it is up to those entities to ensure reporting is done. Whether it be reporting the event themselves or delegating reporting responsibilities, this should all be covered in the entity's event reporting Operating Plan.

**Preston Walker - PJM Interconnection, L.L.C. - 2 - SERC,RF**

**Answer** No

**Document Name**

**Comment**

It appears that Attachment 1 is an effort to consolidate two separate reporting requirements. PJM believes the revision adds a bit of confusion. The 'Automatic' reporting section today states: via automatic undervoltage or underfrequency load shedding schemes, or SPS/RAS. PJM believes that the Standard should incorporate this clarity in the new EOP requirement so there is no confusion about reporting of 'automatic' load shed between 100-300MWs due to loss of BES Facilities (i.e. storms) which could be considered an emergency and also automatic, uncontrolled loss of 300MWs for any reason is reportable, which is why the 100-300MW presents confusion.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. The EOP SDT feels that the Threshold for Reporting is clear, the Responsible Reporting Entity will know if the Firm load shedding was done either manually, automatically or a combination of both.

**Jeffrey DePriest - DTE Energy - Detroit Edison Company - 5**

**Answer** No

**Document Name**

**Comment**

Under physical threats to a facility, suspicious activity at a facility must be defined. I suggest suspicious activity be given its own row (removed from within physical threats to a facility). Specifically, "suspicious device or activity" is ambiguous. Further clarification on "suspicious activity" is needed. For example, does this include photography near a Facility? Also, Attachment 1 should specifically cover cyber related suspicious activity – for example, solicitation attempts or phishing calls at Facilities. There should also be instruction on what an Entity should do if they later realize the incident was NOT suspicious – for example, a prior reported incident which, after further investigation, turns out to be innocuous. The effect of using ambiguous terms and no mechanism for correcting incidents post investigation has left the industry with an output that contains more "trash" than value – many incidents that do not truly meet the definition of EOP 004 are sent out via EISAC which leads to the dilution of truly important incidents.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. The EOP SDT feels the language in the Threshold for Reporting is clear as written. This is the language in the original reporting requirement the only change the EOP SDT made was the removal of “Do not report theft unless it degrades normal operation of a Facility.” Entities should define in their event reporting Operating Plan what they deem as suspicious, and report accordingly.

**Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable, Group Name** ACES Standards Collaborators

**Answer** Yes

**Document Name**

**Comment**

(1) We believe the SDT is attempting to align Transmission Loss events with similar reportable criteria listed under the current NERC Event Analysis process. As identified within supportive documentation for this mature process, Category 1a Events caused by common disturbances affecting BES Facilities only refers to BES-defined lines, generators, and transformers. When capitalizing Facility in the context of this reportable criterion, this includes equipment like shunt compensators, circuit breakers, and busses. Furthermore, events caused by Misoperations are reportable under NERC Reliability Standard PRC-004, and could cause repetitive reporting in the process. If the SDT does not consider the outright removal of this event type from the EOP-004 reportable criteria, we recommend rephrasing the threshold for reporting a Transmission Loss event, as reportable to TOPs only, as “Unexpected loss, within its area and contrary to design or successful automatic reclosing, of three or more Transmission Facilities caused by a common disturbance.”

(2) The reference to “= $>$ ” in the reporting threshold for a BES Emergency resulting in a voltage deviation literally reads “equal to or greater than.” Is the intent of the SDT to identify a reporting threshold greater than  $\pm$  10% of nominal voltage? We propose using the symbol “ $\geq$ ,” to reflect reporting a sustainable voltage deviation that is greater than or equal to  $\pm$  10% of nominal voltage over a continuous 15-minute period.

(3) We believe the proposed reportable threshold reference under Generation Loss should be clarified to identify Forced Outages only. Forced Outages is listed under the NERC Glossary and identifies the removal of generation from service for either emergency reasons or unanticipated failures. We feel the incorporation of references to extreme weather patterns or fuel supply unavailability is unnecessary when used within this context.

Likes 0

Dislikes 0

**Response**

The SDT appreciates your comment regarding Transmission Loss in Attachment 1. The drafting team is comprised of industry SMEs, NERC SMEs, and FERC observers, and the EOP SDT has conducted many discussions on this issue as a result of industry comments received; but finds that there remains a need for this reporting requirement. Transmission Loss event type in Attachment 1 closely aligns with the EAP.

The EOP SDT collaborated with both the Events Analysis Subcommittee, as well as the United States Department of Energy, to better align reporting requirements of EOP-004, the EAP, and the OE-417. The intent of the EAP is to be used to promote a structured and consistent approach to performing event analyses in North America, it is a process for addressing event analysis and provides a lessons learned process and facilitates communication and information exchange among registered entities, NERC and its Regional Entities; it is a voluntary data-gathering tool; whereas the proposed Reliability Standard EOP-004-4 is mandatory.

The EOP SDT appreciates you comment about the voltage reporting requirement in the Threshold for Reporting and will change the language to “A voltage deviation of  $\geq$  10% of nominal voltage sustained for  $>$  15 continuous minutes.”

The EOP SDT discussed your comment and decided no changes were needed to the Generation loss Event Type category.

**sean erickson - Western Area Power Administration - 1**

**Answer** Yes

**Document Name**

**Comment**

Overall the changes to the Standard are positive and WAPA appreciates the efforts of the SDT. However, there is still significant room for confusion regarding reportable Transmission Loss Events as a TOP with the change from Element to Facility. WAPA would very much appreciate examples within the standard that clarify events which would be reportable and events which would not be reportable.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. The previous draft revision from “Elements” to “Facilities” was to align with the EAP. Some examples can be found on the NERC website for Event Analysis Program; specifically, Addendum for Category 1a Events. If further examples or questions arise, contact your Regional Entity.

**Michael Cruz-Montes - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE**

**Answer** Yes

**Document Name**

**Comment**

CenterPoint Energy generally agrees with the SDT’s proposed revisions to EOP-004-3, Attachment 1: Reportable Events, but would like the SDT to consider the following:

The addition of the word “staffed” in front of “BES control center...” becomes a qualifier to distinguish which control center is in scope for reporting to this category. An entity may have more than one control center that is “staffed” but we believe that the control center that is responsible for performing Real-time functions responsible for reliability is the control center that is in scope for when the threshold for complete loss of interpersonal Communication capability has been lost is met. Additionally, the term “control center” is not capitalized. We suggest that the term be capitalized to align with the glossary definition of Control Center and to align with the use Control Center in category 1h as it applies to the loss of monitoring or control at a Control Center. It is not necessary to have BES in front of Control Center because it is already included in the NERC definition.

In summary, CenterPoint energy offers the following suggestions for the Event Type and Threshold for Reporting:

Event Type - Complete loss of Interpersonal Communication and Alternative Interpersonal Communication capability at a Control Center.

Threshold for Reporting - Complete loss of Interpersonal Communication and Alternative Interpersonal Communication capability affecting a staffed Control Center responsible for performing Real-time functions for the reliability of its BES for 30 continuous minutes or more.

Likes 0

Dislikes 0

## Response

Thank you for your comments. The EOP SDT team reviewed your comment about removing “its staffed” related to monitoring or control and Interpersonal/Alternative Interpersonal Communications. The team held many discussion on this topic related to staffed or not staffed; and, yes, it is important to the capability there, but if the site is not staffed the responsible entity will not be aware of the issue plus if you are not actively operating from the site there is no impact on reliability. The team is sure once the issues are identified the responsible entity will resolve the situation.

The EOP SDT reviewed the defined term for Control Center (effective 7/1/2016 as identified in CIP standards) and GOP is included in this definition. The defined term is not applicable, given that the GOPs were not originally identified in Attachment 1 or Attachment 2 as an entity with reporting responsibilities for control center event types. Although the GOPs have other reporting responsibilities, they have no event reporting responsibility for control center event types. There is also not a currently-enforced standard that requires GOPs to have Control Centers or backup Control Centers.

**Russel Mountjoy - Midwest Reliability Organization - 10, Group Name MRO NSRF**

**Answer**

Yes

**Document Name**

**Comment**

The NSRF believes we discovered a compliance concern that may cause entities to be non-compliant with Attachment 1, Event Type of *Transmission loss*. With the use of Facility (and Element) in threshold for reporting, a Transmission Operator may not be aware that the NERC defined term of Facility also contains “a generator”. Even though Event Type *Generation loss* is predicated on a MW threshold, a *Transmission loss* event also contains generators. So, a TOP may lose 2 BES Transmission Facilities AND a BES Generator is tripped (due to the same Event), the TOP has then met the loss of “three or more BES Facilities” and is required to make a report per EOP-004-4.

Either the SDT or NERC should publically post this clarification so all TOPs understand their obligations to the current enforceable EOP-004-2 and any further enforceable EOP-004. BES Elements (lines, transformers, and I5 reactors) that operate as a single Facility should be counted as one Facility. This is predicated on the definition that a Facility is “a set of...”.

Likes 0

Dislikes 0

## Response

The SDT appreciates your comment regarding Transmission Loss in Attachment 1. The previous draft revision from “Elements” to “Facilities” was to align with the EAP. Some examples of Transmission loss can be found on the NERC website for Event Analysis Program; specifically, Addendum for Category 1a Events. If further examples or questions arise, contact your Regional Entity.

**Richard Jackson - U.S. Bureau of Reclamation - 1**

**Answer**

Yes

**Document Name**

**Comment**

Draft Standard EOP-004-4 Attachment 1, under table heading "Event Type", Reclamation respectfully suggests consistent application of the replacement of "a" with "its" when referencing the Responsible Entity's ownership, to be consistent with EOP-004-4 Attachment 2's use of "its".

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Under damage or destruction of "a" Facility, the Event Type is deliberately listed as "a" Facility because the intent is to report on "all" Facilities in its RC/BA/TOP area.

**Michael Watkins - Michael Watkins On Behalf of: Pawel Krupa, Seattle City Light, 1, 4, 5, 6, 3; - Michael Watkins**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Michael Watkins - Michael Watkins On Behalf of: Pawel Krupa, Seattle City Light, 1, 4, 5, 6, 3; - Michael Watkins**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Mike Beuthling - Mike Beuthling On Behalf of: Payam Farahbakhsh, Hydro One Networks, Inc., 1, 3; - Mike Beuthling**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Joshua Smith - Joshua Smith On Behalf of: Lee Maurer, Oncor Electric Delivery, 1; - Joshua Smith**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Ryan Olson - Portland General Electric Co. - 5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Michelle Amarantos - APS - Arizona Public Service Co. - 1**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Ryan Olson - Portland General Electric Co. - 5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response****Jerome Gobby - Sempra - San Diego Gas and Electric - 5****Answer**

Yes

**Document Name****Comment**

Likes 0

Dislikes 0

**Response****Laura Nelson - IDACORP - Idaho Power Company - 1****Answer**

Yes

**Document Name****Comment**

Likes 0

Dislikes 0

**Response****Michael Watkins - Michael Watkins On Behalf of: Pawel Krupa, Seattle City Light, 1, 4, 5, 6, 3; - Michael Watkins****Answer**

Yes

**Document Name****Comment**

Likes 0

Dislikes 0

**Response**

**Michael Watkins - Michael Watkins On Behalf of: Pawel Krupa, Seattle City Light, 1, 4, 5, 6, 3; - Michael Watkins**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Si Truc Phan - Hydro-Qu?bec TransEnergie - 1 - NPCC**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Andrew Pusztai - Andrew Pusztai**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Glen Farmer - Avista - Avista Corporation - 1,3,5**

**Answer** Yes

**Document Name**

**Comment**



Likes 0

Dislikes 0

**Response**

**Thomas Foltz - AEP - 5**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Shannon Fair - Colorado Springs Utilities - 6, Group Name Colorado Springs Utilities**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Karl Blaszkowski - CMS Energy - Consumers Energy Company - 3**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Karl Blaszkowski - CMS Energy - Consumers Energy Company - 3**

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	

3. Do you agree with the proposed revisions to EOP-004-3, Attachment 2? If you do not agree, or if you agree but have comments or suggestions on the SDT's recommendation, please provide your explanation and suggested language.

**Jeffrey DePriest - DTE Energy - Detroit Edison Company - 5**

**Answer** No

**Document Name**

**Comment**

I suggest suspicious activity be given its own row.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. The EOP SDT finds that suspicious activity within Event Types: "Physical threats to its Facility and Physical threats to its BES control center" are clear as written in the Threshold for Reporting and does not require its own row.

**Rachel Coyne - Texas Reliability Entity, Inc. - 10**

**Answer** No

**Document Name**

**Comment**

Please see Texas RE's comment for #2.

Likes 0

Dislikes 0

**Response**

Thank you for your comment. Please see response to Question 2.

**Ryan Buss - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer** No

**Document Name**

**Comment**

BPA believes that the language should only refer to required event reporting to Operating Plan entities (e.g. NERC and/or DOE) within the reporting period.

Likes 0

Dislikes 0

<b>Response</b>	
Thank you for your comment. The EOP SDT finds that the Responsible Entity can define who the entities they report are within their event reporting Operating Plan.	
<b>Russel Mountjoy - Midwest Reliability Organization - 10, Group Name MRO NSRF</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Richard Jackson - U.S. Bureau of Reclamation - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Reclamation suggests consistent application of the replacement of "a" with "its" as it pertains to the Responsible Entity's ownership.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your comment. Under damage or destruction of "a" Facility, the Event Type is deliberately listed as "a" Facility because the intent is to report on "all" Facilities in its RC/BA/TOP area.	
<b>Sing Tay - Sing Tay On Behalf of: Donald Hargrove, OGE Energy - Oklahoma Gas and Electric Co., 3, 1, 6, 5; - Sing Tay</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Depending on the changes (if any) made to the recommendations stated in Question 2 above for Event Type "Transmission loss", Attachment 2 will need to be revised accordingly.	
Likes 0	
Dislikes 0	

<b>Response</b>	
Thank you for your comment.	
<b>Michael Cruz-Montes - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
CenterPoint Energy suggests that the "Tasks" in Attachment 2 Event Reporting Form align with the Event Types in Attachment 1 if revised by the SDT.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment. Attachment 2 has been updated.	
<b>Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standards Collaborators</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	Proposed_EOP-004-4_Attachment2.docx
<b>Comment</b>	
We find the proposed two-page format of the Attachment 2 form impractical. We offer a single page solution, as an attachment and proof that this information can be condensed accordingly.	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your comment. Formatting has been changed to reduce Attachment 2 to a one-page document.	
<b>Karl Blaszkowski - CMS Energy - Consumers Energy Company - 3</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	

**Karl Blaszkowski - CMS Energy - Consumers Energy Company - 3**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Preston Walker - PJM Interconnection, L.L.C. - 2 - SERC,RF**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Shannon Fair - Colorado Springs Utilities - 6, Group Name Colorado Springs Utilities**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Thomas Foltz - AEP - 5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Glen Farmer - Avista - Avista Corporation - 1,3,5**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Andrew Pusztai - Andrew Pusztai**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Si Truc Phan - Hydro-Quebec TransEnergie - 1 - NPCC**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Michael Watkins - Michael Watkins On Behalf of: Pawel Krupa, Seattle City Light, 1, 4, 5, 6, 3; - Michael Watkins**

Answer	Yes
Document Name	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Michael Watkins - Michael Watkins On Behalf of: Pawel Krupa, Seattle City Light, 1, 4, 5, 6, 3; - Michael Watkins</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes 0	



Dislikes 0

**Response**

**Don Schmit - Nebraska Public Power District - 5**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Laura Nelson - IDACORP - Idaho Power Company - 1**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Jerome Gobby - Sempra - San Diego Gas and Electric - 5**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Ryan Olson - Portland General Electric Co. - 5**

**Answer**

Yes

<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Michelle Amarantos - APS - Arizona Public Service Co. - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Ryan Olson - Portland General Electric Co. - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	

**Response**

**Jamison Cawley - Nebraska Public Power District - 1**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Joshua Smith - Joshua Smith On Behalf of: Lee Maurer, Oncor Electric Delivery, 1; - Joshua Smith**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Tony Eddleman - Nebraska Public Power District - 3**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response****Mike Beuthling - Mike Beuthling On Behalf of: Payam Farahbakhsh, Hydro One Networks, Inc., 1, 3; - Mike Beuthling****Answer**

Yes

**Document Name****Comment**

Likes 0

Dislikes 0

**Response****Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,10 - NPCC, Group Name RSC no Dominion****Answer**

Yes

**Document Name****Comment**

Likes 0

Dislikes 0

**Response****Elizabeth Axson - Electric Reliability Council of Texas, Inc. - 2****Answer**

Yes

**Document Name****Comment**

Likes 0

Dislikes 0

**Response**

**Michael Watkins - Michael Watkins On Behalf of: Pawel Krupa, Seattle City Light, 1, 4, 5, 6, 3; - Michael Watkins**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Michael Watkins - Michael Watkins On Behalf of: Pawel Krupa, Seattle City Light, 1, 4, 5, 6, 3; - Michael Watkins**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

4. Please provide any additional comments you have on the proposed revisions and clarifications to EOP-004-3.

Ryan Buss - Bonneville Power Administration - 1,3,5,6 - WECC

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standards Collaborators

Answer

Document Name

Comment

(1) Based on the specifics of Attachment 1, we believe there is sufficient information available to include an applicability section within the standard pertaining to Facilities. The intent of this standard is to not capture events occurring on non-BES identified facilities. This would include reporting on small generating resources or dispersed power producing resources with nameplate ratings under 20 MVA or aggregate nameplate ratings under 75 MVA that are connected to a common connection point at 100 kV or above.

(2) We question the VSL for Requirement R2 identifying a severity for when a Responsible Entity fails to submit an event report within 24 hours. We ask the SDT to clarify if the severity is based on 24 hours of the event's discovery or within 24 hours of the event's conclusion, independently of the expectation already proposed within the requirement text.

(3) From the last commenting period for this draft standard revision, we previously recommended the implementation of an event reporting software tool on the NERC website providing capabilities to notify applicable Regional Entities and the DOE. We thank the SDT for its efforts to align event reporting activities with the DOE. However, based on the SDT's response to our comments, we are left with the impression that no automated mechanism is available to share event notifications submitted to the DOE with required Regional Entities, Reliability Coordinators, law enforcement, and other governmental authorities per Requirement R1. We believe a preventable human performance issue could be diverted through the development of a centralized portal that would disperse event reports to appropriate entities when necessary. We again ask the NERC Standards Developer assigned to this project to share this comment with NERC's IT department to see if a viable solution is available or could be developed.

(4) We thank you for this opportunity to provide feedback.

Likes 0

Dislikes 0

Response

Thank you for your comments. Attachment 1, as it relates to Facilities, is clear as written. A Facility is defined in the NERC Glossary as; “A set of electrical equipment that operates as a single BES Element (e.g., a line, a generator, a shunt compensator, transformer, etc.)” The EOP SDT has updated the VSLs for Requirement R2. NERC Events Analysis has been forwarded your comment regarding implementation of an event reporting software.

**Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,10 - NPCC, Group Name RSC no Dominion**

**Answer**

**Document Name**

**Comment**

R2 of EOP-004-4 state:

Each Responsible Entity shall report events specified in EOP-004-4 Attachment 1 to the entities specified per their event reporting Operating Plan:

-by the later of 24 hours of recognition of meeting an event type threshold for reporting

or

-by the end of the Responsible Entity's next business day (4 p.m. local time will be considered the end of the business day).

The VSL Section state:

The Responsible Entity submitted an event report (e.g., written or verbal) to all required recipients more than 24 hours but less than or equal to 36 hours after recognition of meeting an event threshold for reporting.

By example, if an event occurred at midnight (12 a.m. Tuesday), the entity can submit a report by the end of the next business day (4 p.m. local time will be considered the end of the business day) which is Wednesday 4p.m. That means 40 hours after the event.

We suggest to remove this paragraph “The Responsible Entity submitted an event report (e.g., written or verbal) to all required recipients more than 24 hours but less than or equal to 36 hours after recognition of meeting an event threshold for reporting. OR” of the Lower VSL.

We suggest also modifying the moderate VSL as following: “The Responsible Entity submitted an event report (e.g., written or verbal) to all required recipients more than 40 hours but less than or equal to 48 hours after recognition of meeting an event threshold for reporting.”

1. In the section below, not sure why “Event Report” is capitalized? It seems that this “NOTE” intends to give an entity flexibility on the reporting timing, “under certain adverse conditions”, by differentiating between issuing a “written Event Report” and a “notification” (still to be done within timing requirements of R2), but I’m not sure this is the reasons for capitalizing “Event Report”?

### **EOP-004 - Attachment 1: Reportable Events**

NOTE: Under certain adverse conditions (e.g. severe weather, multiple events) it may not be possible to report the damage caused by an event and issue a written Event Report within the timing in the standard. In such cases, the affected Responsible Entity shall notify parties per Requirement R2 and provide as much information as is available at the time of the notification. Submit reports to the ERO via one of the following: e-mail: systemawareness@nerc.net, Facsimile 404-446-9770 or Voice: 404-446-9780, select Option 1

2. For SDT's consideration - Event Types in the Attachment 1 do not seem to capture GOP BES control centers (either evacuation or physical threats)?

- By capitalizing "Facility" in the Event Type for a "Physical Threat to its Facility", since this term is defined in the NERC Glossary (and does not capture control center in the definition), this category excludes GOPs from reporting physical threats to their BES control centers under EOP-004.
- By excluding GOPs from the "Entity with Reporting Responsibility" list in the "Unplanned BES control center evacuation" Event Type, this category excludes GOPs from reporting evacuations from their BES control centers under EOP-004.
- Same as the bullet above for the "Complete loss of Interpersonal Communication capability at a BES control center"

Not sure if this is an intentional omission? CIP standards explicitly identify GOP control centers (High, Medium and Low Impact Rating) as subject to CIP requirements. CIP requirements are being implemented recognizing that there is an impact on BES from a CIP incident on a GOP control center, but EOP-004 doesn't capture non-cyber events associated with the same facilities for reporting requirements – seems inconsistent.

At least High Impact GOP control centers, under the "Threshold for Reporting" should be considered for reporting requirements under EOP-004, for the events identified above.

This comment is being submitted recognizing that the current version of EOP-004-2 does not required this reporting either, for the same reasons identified in the three bullets above.

Likes 0

Dislikes 0

### Response

Thank you for your comments. The EOP SDT updated the VSLs for Requirement R2. The first paragraph of EOP-004, Attachment 1, has been updated.

The EOP SDT reviewed the defined term for Control Center (effective 7/1/2016 as identified in CIP standards) and GOP is included in this definition. The defined term is not applicable, given that the GOPs were not originally identified in Attachment 1 or Attachment 2 as an entity with reporting responsibilities for control center event types. Although the GOPs have other reporting responsibilities, they have no event reporting responsibility for control center event types. There is also not a currently-enforced standard that requires GOPs to have Control Centers or backup Control Centers. In addition, there is no specific requirement in CIP-006 to report any physical threats to a Facility. CIP-006 says to refer to CIP-008 Cyber Security response plan. The Cyber Security response plan requires notification to E-SIAC only, which is not related to EOP-004 reporting.

**Rachel Coyne - Texas Reliability Entity, Inc. - 10**

**Answer**

**Document Name**

**Comment**

In its previous comments, Texas RE requested that the SDT provide the rationale for adopting a 12-month implementation timeframe. In particular, Texas RE noted that "Given that registered entities presently are required to submit event reports under the current version of EOP-004 and the revised version largely narrows the scope of such reporting activities, it is unclear why a 12-month implementation period is necessary." With this comment,



Texas RE sought to understand the basis for the SDT's conclusion that a 12-month period was necessary to give entities appropriate time to address the revised Standard requirements. Rather than provide a rationale in its response, the SDT merely noted that its intent is for the 12-month Implementation Plan "was to give all entities an appropriate time frame for implementation."

Texas RE therefore reiterates its request that the SDT provide a substantive basis for its determination that a 12-month time frame is appropriate. In response, the SDT could describe the additional compliance obligations for entities for the revisions, whether these will impose additional costs, require additional staffing, or other compliance burdens that serve as the basis for its conclusion.

Likes 0

Dislikes 0

### Response

The Implementation Plan takes into account any barriers to implementation. The EOP SDT intent for the twelve-month Implementation Plan was to give all entities an appropriate time frame for implementation. Based on the EOP SDT's expertise, there are multiple processes that a NERC standard procedure has to go through and evaluated by an entity prior to being finalized, trained on, and approved. This standard would require changes to processes/procedures and training shift workers which requires ample time; and, therefore, a 12-month Implementation Plan is required.

**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group**

Answer

Document Name

Comment

We suggest capitalizing the term "**control center**" as it's defined in the NERC Glossary of Terms. Additionally, the terms "Reliability Coordinator (RC)", "Balancing Authority (BA)", and "Transmission Operator (TOP)" (applicable in the **Entity with Reporting Responsibility sections of Attachment 1**) are terms included in the definition of the term "**Control Center**" which provides more details on why the term should be capitalized throughout Attachment 1.

Likes 0

Dislikes 0

### Response

The EOP SDT reviewed the defined term for Control Center (effective 7/1/2016 as identified in CIP standards) and GOP is included in this definition. The defined term is not applicable, given that the GOPs were not originally identified in Attachment 1 or Attachment 2 as an entity with reporting responsibilities for control center event types. Although the GOPs have other reporting responsibilities, they have no event reporting responsibility for control center event types. There is also not a currently-enforced standard that requires GOPs to have Control Centers or backup Control Centers.

**Sing Tay - Sing Tay On Behalf of: Donald Hargrove, OGE Energy - Oklahoma Gas and Electric Co., 3, 1, 6, 5; - Sing Tay**

Answer

Document Name

**Comment**

N/A.

Likes 0

Dislikes 0

**Response****Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC****Answer****Document Name****Comment**

None.

Likes 0

Dislikes 0

**Response****Si Truc Phan - Hydro-Quebec TransEnergie - 1 - NPCC****Answer****Document Name****Comment**

R2 of EOP-004-4 state:

Each Responsible Entity shall report events specified in EOP-004-4 Attachment 1 to the entities specified per their event reporting Operating Plan:

-by the later of 24 hours of recognition of meeting an event type threshold for reporting

or

-by the end of the Responsible Entity's next business day (4 p.m. local time will be considered the end of the business day).

The VSL Section state:

The Responsible Entity submitted an event report (e.g., written or verbal) to all required recipients more than 24 hours but less than or equal to 36 hours after recognition of meeting an event threshold for reporting.

Based on this example, if an event occurred at midnight (12 a.m. Tuesday), the entity can submit a report by the end of the next business day (4 p.m. local time will be considered the end of the business day) which is Wednesday 4p.m. That means **40** hours after the event.

On the Lower VSL, Hydro-Quebec TransEnergie suggest to remove this paragraph “The Responsible Entity submitted an event report (e.g., written or verbal) to all required recipients more than 24 hours but less than or equal to 36 hours after recognition of meeting an event threshold for reporting. OR” .

On the Moderate VSL, Hydro-Quebec TransEnergie suggest modifying as following: “The Responsible Entity submitted an event report (e.g., written or verbal) to all required recipients more than 40 hours but less than or equal to 48 hours after recognition of meeting an event threshold for reporting.”

Likes 0

Dislikes 0

### Response

Thank you for your comments. The EOP SDT updated the VSLs for Requirement R2.

**Shannon Fair - Colorado Springs Utilities - 6, Group Name** Colorado Springs Utilities

Answer

Document Name

### Comment

The VSLs for R2 need to reflect the change in reporting deadlines to accommodate the reporting entity's next business day

Likes 0

Dislikes 0

### Response

Thank you for your comment. The EOP SDT has updated the VSLs for Requirement R2.

**Jeffrey DePriest - DTE Energy - Detroit Edison Company - 5**

Answer

Document Name

### Comment

“Suspicious device or activity” in Attachment 1 is not defined even though Suspicious is capitalized. The NERC Glossary of Terms does not define “Suspicious” either.

Likes 0

Dislikes 0

### Response

Thank you for your comment. “Suspicious” is capitalized because it is the first word in a new sentence. It was not the intent of the EOP SDT for “suspicious” to be defined.