

Consideration of Comments

Project Name: 2015-08 Emergency Operations

Comment Period Start Date: 07/21/2015

Comment Period End Date: 08/19/2015

There were 20 sets of responses, including comments from approximately 87 different people from approximately 66 different companies representing 7 of the 10 Industry Segments as shown on the following pages.

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process. If you feel there has been an error or omission, you can contact the Director of Standards, [Howard Gugel](#) (via email) or at (404) 446-2560.

Questions

1. The scope of this project includes:
 - Implement the recommendations of the periodic review team related to the following standards:
 - EOP-004-2
 - EOP-005-2
 - EOP-006-2
 - EOP-00801
 - Improve quality, relevance and clarity of the standards
 - Bring standards into Results-Based format
 - Apply Paragraph 81 criteria and recommendations from Independent Expert Review Panel

Do you agree with this scope? If not, please explain.

2. The SAR identifies a list of reliability functions that may be assigned responsibility for requirements in the set of standards addressed by this SAR. Do you agree with the list of proposed applicable functional entities? If no, please explain.
3. Are you aware of any regional variances that will be needed as a result of this project? If yes, please identify the regional variance:
4. Are you aware of any business practice that will be needed or that will need to be modified as a result of this project? If yes, please identify the business practice:
5. Are you aware of any Canadian provincial or other regulatory requirements that may need to be considered during this project in order to develop a continent-wide approach to the standard(s)? If yes, please identify the jurisdiction and specific regulatory requirements.
6. If you have any other comments on this SAR that you haven't already mentioned above, please provide them here:

The Industry Segments are:

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

1. The scope of this project includes:

- *Implement the recommendations of the periodic review team related to the following standards:*
 - o *EOP-004-2*
 - o *EOP-005-2*
 - o *EOP-006-2*
 - o *EOP-008-1*
- *Improve quality, relevance and clarity of the standards*
- *Bring standards into Results-Based format*
- *Apply Paragraph 81 criteria and recommendations from Independent Expert Review Panel*

Do you agree with this scope? If not, please explain.

Summary Responses:

Many commenters made comments and recommendations for revisions to EOP-004, Attachment 1: The EOP SDT will review comments/recommendations made to the EOP PRT during comment period of final recommendations (as well as these SAR comments), as many received had merit and the EOP SDT intends to make a thorough review of these comments in consideration of developing the revisions to the standards.

To clarify from comments received, the EOP PRT *did not* recommend retirement of Requirement R10 in EOP-005 or Requirement R9 in EOP-006. The EOP PRT's final recommendation was that these requirements be evaluated for either *inclusion* into the PER family of standards; or, in the alternative, be *retained* in EOP-005 and EOP-006.

A comment was received regarding the approach for commenting and balloting Project 2015-08, Emergency Operations. The EOP SDT agrees with the approach utilized by the Project 2015-04 team. The EOP SDT will add commenting/balloting approach to its agenda for with the September 2015 kick-off meeting, or at its November 2015 in-person meeting. The EOP SDT will be required to have each standard's commenting and balloting conducted separately; however, since the revisions and retirements of requirements are being developed concurrently, the standards will likely post for commenting and balloting during the same time periods. The EOP SDT would not be allowed to ballot requirements and/or attachments separately from the standard they are contained within. Each standard would need to pass or fail ballot in its entirety. The EOP SDT will consider whether an informal comment period would be beneficial for each standard; in particular EOP-004 (due to attachments) during the development process, or whether focused outreach to gather industry inputs during development is more efficient and effective.

In response to a comment received, the EOP SDT will implement the recommendation of the EOP PRT by *reviewing* the VSL in Requirement R1 *to determine* if it should be revised for consistency with the VSL level in Requirement R2. The EOP SDT will consider all comments received on this revision prior to determining the appropriate action to take on the revision.

To clarify the EOP PRT's intent for the review for revision of Requirement R5 was to consider the current language of "implementation date" and consider if the use of the term "effective date," or "approval date" would provide additional clarity, or if the current language "implementation date" is clear as written.

Louis Slade - Dominion - Dominion Resources, Inc. - 6 -

Group Name:

Dominion NCP

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	NPCC	5,6
Randi Heise	NERC Compliance Policy	SERC	1,3,5,6
Connie Lowe	NERC Compliance Policy	SERC	1,3,5,6
Louis Slade	NERC Compliance Policy	RFC	5,6

Selected Answer: Yes

Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO

Group Name: MRO-NERC Standards Review Forum (NSRF)

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6

Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

Selected Answer: Yes

John Fontenot - Bryan Texas Utilities - 1 -

Selected Answer: Yes

Leonard Kula - Independent Electricity System Operator - 2 -

Selected Answer: Yes

Answer Comment:

We generally agree with the proposed scope, but would reiterate the following concerns/suggestions which we submitted when we commented on the initial posting of the PRT’s recommendations. We propose that these concerns/suggestions be duly considered during standard drafting:

a. EOP-004

(IESO comment) We agree with the initial recommendation which outlines three clarifying revisions to Attachment 1 of EOP-004-2, but believe that this recommendation falls way short of providing the needed clarity to the obligations of the Responsible Entities listed in Attachment 1. We further believe that certain items listed in Attachment 1 serve to support post-mortem analysis but do not contribute to operating reliability, and may be redundant with similar requirements already stipulated in the Event Analysis Process document. We therefore offer the following comments:

- The lack of clarity can result in registered entities being found potentially

noncompliant with certain requirements. As an example, on P.10 of EOP-004-2, when there is a loss of firm load \geq 300 MW for entities with previous year's demand \geq 3,000 or \geq 200 MW for all other entities, the BA, TOP or DP is held responsible for reporting. It is unclear on the size of MW in relation to which particular entity's previous year's demand size, and whether or not all three entities are responsible for reporting, or just one of them needs to report, and if so, which one of the three? Also, if it is meant to be one of the three, it is not clear whether or not the location or area within which the load loss occurs would dictate which one of the three entities has that obligation.

When the loss of load occurs in a distribution system, is it the DP's obligation to report? Likewise, is the TOP obligated to report when the loss involves those loads that are tapped off the transmission network? Depending on the answer to the above, what is the role of the BA? Finally, if all three are obligated to report, doesn't the requirement make it cumbersome and redundant when all three entities files reports to the recipient entities/authorities?

We believe that Attachment 1 needs to be revised to clarify the 3000 MW relationship with a specific entity's previous year's demand, and to hold a single entity responsible for reporting this type of events. The latter recommendation also applies to other events in Attachment 1 where there are multiple entities listed as having the obligation to take actions.

- We believe that the requirement to report loss of load is not needed for reliability, unlike their interruption to BES facility counterparts. Loss of load is usually caused by loss of facilities, or by frequency or voltage excursions resulting from events that are already listed in Attachment 1 (e.g., voltage deviation, generation loss, etc.). We further believe that while this information is needed for post-mortem event analysis, this information reporting requirement is already stipulated in the Event Analysis Process document, and mandated by local regulatory authorities. Reporting such events to the ERO, the RE and other entities is redundant and does not help to improve operating reliability. Further, since loss of load by itself does not have any impact on the Bulk Electric System reliability, reporting such events is inconsistent

with the principle “...to report disturbances and events that threaten the reliability of the Bulk Electric System” as indicated in the Guideline and Technical Basis of the standard. We therefore suggest that this requirement be removed from Attachment 1 as it is not needed for operating reliability and is redundant with the requirement for event analysis stipulated elsewhere or mandated by local regulatory authorities.

- If for whatever reasons the loss of load reporting requirement is retained in Attachment 1, we request the SDT to provide the technical justification for the threshold values of ≥; 300 MW for entities with previous year’s demand ≥; 3,000 or ≥; 200 MW for all other entities. We believe these thresholds are too low to warrant any special attention and reporting burden by the Responsible Entities. For example, an area load of several hundred MW that is normally supplied by two transmission lines may be lost due to one of the lines being out of serviced for maintenance while the other suffering a contingency loss. To avoid having to report such load loss resulting from routine operating practices and recognized contingencies (with respect to design and operating criteria), we believe the reporting threshold should be raised to a level of at least 1,000 MW. We further suggest the SDT seek input from the NERC technical committees on the threshold values if the SDT should decide to keep this requirement, which we believe is not needed for operating reliability. (End of IESO comment)

In the response to comment, the PRT indicates that:

[The EOP PRT will recommend in the SAR for the future drafting team to review recommendations based on the comments received for Attachment 1, but will not suggest specific rewrites. The EOP PRT believes all recommendations have merit and need a thorough review by the future SDT when formed for this standard.]

Also, in the redline recommendations, the PRT proposes that:

[“...Attachment 1 - The EOP PRT recommends the future Standard Drafting Team (SDT) conduct a thorough review of Attachment 1 and consider the following revisions to Attachment 1 for clarity, such as...”; and “...differing regional data

submittal requirements when reviewing EOP-004-2 for revisions.”]

The SAR does not provide any details or specificities on which parts of Attachment 1 will be revised. It is unclear whether or not our specific comments/suggestions will be addressed during the standard drafting phase. We therefore urge the SDT to carefully consider the above comments/suggestions, as proposed in the PRT’s response.

b. EOP-005

Again, we’d like to reiterate our previous comments below since the SAR does not provide any details or specificities on the treatment to the concerned requirement (R10), in the revised EOP-005 standard, or any other standard that this requirement will be mapped into:

(IESO comment) We do not agree with the proposal to retire Requirement R10 as we do not believe this requirement is duplicative of any requirements in PER-005-2.

We assess that the Independent Expert Panel’s recommendation to retire R10 was based on its assessment that this requirement was duplicative of R3 of PER-005-1, which stipulates that:

R3. At least every 12 months each Reliability Coordinator, Balancing Authority and Transmission Operator shall provide each of its System Operators with at least 32 hours of emergency operations training applicable to its organization that reflects emergency operations topics, which includes system restoration using drills, exercises or other training required to maintain qualified personnel.

This recommendation appeared to be appropriate at that time. However, in PER-005-2 (revised from PER-005-1), the requirement to provide system restoration training no longer exists. In fact, the rationale to remove the minimum training requirement specific to system restoration from PER-005-1 was in part based on the existence of Requirement R10 in EOP-005-2 (and R9 in EOP-006-2).

If Requirement R10 in EOP-005 is removed, then there will not be any requirements to provide system restoration training to operating personnel in any standards. We therefore suggest that this requirement be retained. (End of IESO comment)

Note that the PRT's response (below) essentially agree with our concern, but the SAR does not provide any clear indication as to the proposed treatment to Requirement R10.

[The EOP PRT does not find that there is adequate justification providing annual system restoration training for System Operators in another standard. Therefore, the EOP PRT recommends that the future SDT evaluate moving R10 into the PER family of standards; and if unable, Requirement R10 will be maintained in EOP-005.]

c. EOP-006

Similar to EOP-005, we had a concern with the proposed retirement of Requirement R9. Therefore, we are reiterating our comments on EOP-006, below for the SDT's consideration:

(IESO comment) We agree with the proposed retirement of Parts R1.2, R1.3 and R1.4, but do not agree with retiring Requirement R9 (which mirrors R10 in EOP-005-2) as we do not believe this requirement is duplicative of any requirements in PER-005-2.

Similar to our comments on the proposed retirement of R10 in EOP-005-2, we assess that the Independent Expert Panel's recommendation to retire R9 in EOP-006-2 was based on its assessment that this requirement was duplicative of R3 in PER-005-1, which stipulates that:

R3. At least every 12 months each Reliability Coordinator, Balancing

Authority and Transmission Operator shall provide each of its System Operators with

Response:

at least 32 hours of emergency operations training applicable to its organization that reflects emergency operations topics, which includes system restoration using drills, exercises or other training required to maintain qualified personnel.

The recommendation to retire R9 of EOP-006-2 appeared to be appropriate at that time. However, in PER-005-2 (revised from PER-005-1), the requirement to provide system restoration training to RC operating personnel no longer exists. In fact, the rationale to remove the minimum training requirement specific to system restoration from PER-005-1 was in part based on the existence of Requirement R10 in EOP-005-1, and R9 in EOP-006-2.

If Requirement R9 in EOP-006-2 is removed, then there will not be any requirement to provide system restoration training to operating personnel. We therefore suggest that this requirement be retained.

The PRT's response is essentially the same as its response to our comment on EOP-005; hence it's not repeated here.

Thank you for your comments.

Attachment 1: The EOP SDT will review comments/recommendations made to the EOP PRT during comment period of final recommendations (as well as these SAR comments), as many received had merit and the EOP SDT intends to make a thorough review of these comments in consideration of developing the revisions to the standards.

EOP-005/EOP-006: The EOP PRT did not recommend retirement of Requirement R10 in EOP-005 or Requirement R9 in EOP-006. The EOP PRT's final recommendation was that these requirements be evaluated for either inclusion into the PER family of standards; or, in the alternative, be retained in EOP-005 and EOP-006.

christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -

Selected Answer: Yes

Answer Comment: ERCOT agrees with the scope, but reiterates its comments and the SRC's comments on the results of the periodic review as well as the SRC's comments on the SAR.

Response: Thank you for your comment. Please see responses to SRC's comments below.

Thomas Foltz - AEP - 5 -

Selected Answer: Yes

Randi Heise - Dominion - Dominion Resources, Inc. - 5 -

Group Name: Dominion - RCS

Group Member Name	Entity	Region	Segments
Larry Nash	Dominion Virginia Power	SERC	1
Louis Slade	Dominion Resources, Inc.	SERC	6
Connie Lowe	Dominion Resources, Inc.	RFC	3
Randi Heise	Dominion Resources, Inc,	NPCC	5

Selected Answer: Yes

Ben Li - Independent Electricity System Operator - 2 - NPCC

Group Name: ISO/RTO Council Standards Review Committee

Group Member Name	Entity	Region	Segments
Charles Yeung	SPP	SPP	2
Greg Campoli	NYISO	NPCC	2
Ali Miremadi	CAISO	WECC	2
Ben Li	IESO	NPCC	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Terry Bilke	MISO	MRO	2

Selected Answer:

Yes

Answer Comment:

The SRC generally agrees with the proposed scope, but, as it was unclear through the PRT's responses to comments whether or how such comments would be addressed by the SDT, the SRC would reiterate the following concerns/suggestions that were submitted as comments by the SRC on the initial posting of the PRT's recommendations. The SRC requests that these concerns/suggestions be duly considered during standard drafting:

a. EOP-004

The SRC reiterates that the requirement to report loss of load is not needed for reliability, unlike their interruption to BES facility counterparts. Since loss of load by itself does not have any impact on the Bulk Electric System reliability, reporting such events is inconsistent with the principle "...to report disturbances and events that threaten the reliability of the Bulk Electric System" as indicated in the Guideline and Technical Basis of the standard. The SRC, therefore, suggests that this requirement be removed from Attachment 1 as it is not needed for operating reliability and is redundant with the requirement for event analysis stipulated through other regulatory authorities. If for whatever reasons the loss of load reporting requirement is retained in Attachment 1, the SRC requests that the SDT seek input from the NERC technical committees to provide the technical justification for the threshold values of

≥; 300 MW for entities with previous year's demand ≥; 3,000 or ≥; 200 MW for all other entities.

b. EOP-005

The SRC does not agree with the proposal to retire Requirement R10 as the Independent Expert Panel's recommendation to retire R10 was based on its assessment that this requirement was duplicative of R3 of PER-005-1, which stipulates that:

R3. At least every 12 months each Reliability Coordinator, Balancing Authority and Transmission Operator shall provide each of its System Operators with at least 32 hours of emergency operations training applicable to its organization that reflects emergency operations topics, which includes system restoration using drills, exercises or other training required to maintain qualified personnel.

This recommendation appeared to be appropriate at that time. However, in PER-005-2 (revised from PER-005-1), the requirement to provide system restoration training no longer exists. If Requirement R10 in EOP-005 is removed, then there will not be any requirements to provide system restoration training to operating personnel in any standards. We therefore suggest that this requirement be retained.

c. EOP-006

Similar to EOP-005, the SRC had a concern with the proposed retirement of Requirement R9. Our comments on EOP-006 are, therefore, reiterated for the SDT's consideration.

The SRC does not agree with the proposal to retire Requirement R9 as the Independent Expert Panel's recommendation to retire R9 was based on its assessment that this requirement was duplicative of R3 of PER-005-1, which stipulates that:

R3. At least every 12 months each Reliability Coordinator, Balancing Authority and Transmission Operator shall provide each of its System Operators with at least 32 hours of emergency operations training applicable to its organization that reflects emergency operations topics, which includes system restoration using drills, exercises or other training required to maintain qualified personnel.

This recommendation appeared to be appropriate at that time. However, in PER-005-2 (revised from PER-005-1), the requirement to provide system restoration training no longer exists. If Requirement R9 in EOP-005 is removed, then there will not be any requirements to provide system restoration training to operating personnel in any standards. We therefore suggest that this requirement be retained.

Response:

Thank you for your comments.

Attachment 1: The EOP SDT will review comments/recommendations made to the EOP PRT during comment period of final recommendations (as well as these SAR comments), as many received had merit and the EOP SDT intends to make a thorough review of these comments in consideration of developing the revisions to the standards/attachments.

EOP-005 and EOP-006: The EOP PRT did not recommend retirement of Requirement R10 in EOP-005 or Requirement R9 in EOP-006. The EOP PRT's final recommendation was that these requirements be evaluated for either inclusion into the PER family of standards; or, in the alternative, be retained in EOP-005 and EOP-006.

Scott Langston - Tallahassee Electric (City of Tallahassee, FL) - 1 -

Selected Answer: Yes

Karen Webb - Tallahassee Electric (City of Tallahassee, FL) - 5 -

Selected Answer: Yes

Nick Vtyurin - Manitoba Hydro - 1,3,5,6 - MRO

Selected Answer: Yes

Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC

Group Name: Duke Energy

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

Selected Answer: Yes

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

Selected Answer: Yes

Answer Comment: Texas RE agrees that clarifications included in the periodic review should be a starting point for improvement of the Reliability Standards listed. Texas RE encourages the SDT selected to review comments in terms of ensuring reliability and clarifying references and requirements.

Response:

Thank you for your comments. The EOP SDT will review comments/recommendations made to the EOP PRT during comment period, as many received had merit and the EOP SDT intends to make a thorough review of these comments in consideration of developing the revisions to the standards.

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP

Group Name: SPP Standards Review Group

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool Inc.	SPP	2
Jason Smith	Southwest Power Pool Inc	SPP	2
Carl Stelly	Southwest Power Pool Inc	SPP	2
Mike Kidwell	Empire District Electric Company	SPP	1,3,5
Ashley Stringer	Oklahoma Municipal Power Authority	SPP	4
James "Jim" Nail	City of Independence, Missouri	SPP	3,5
Ellen Watkin	Sunflower Electric Power Corporation	SPP	1

Selected Answer:

Yes

Answer Comment:

Our review team agrees with the scope of this project however, we would suggest to the drafting team to make sure they have implemented a strong differentiation process on what needs to be retired or proposed/recommended for all the standards involved in this project. In the past, there has been confusion in the voting process to where one project has an affiliation with other projects in the Standard Development Process and a negative vote has delayed the entire project due to small details not being communicated effectively. Additionally, we would suggest using the approach

taken by the Alignment of Terms Drafting Team (Project 2015-04). They submitted twenty-six terms to be voted on however, the industry had to vote on each individual term. So if the industry voted no for one term or terms, it would call for an re-evaluation for those particular term(s) and not cause a delay to the entire project (unless the changes were significant enough).

Response:

Thank you for your comments. The EOP SDT agrees with the approach utilized by the Project 2015-04 team. The EOP SDT will add commenting/balloting approach to its agenda for with the September 2015 kick-off meeting, or at its November 2015 in-person meeting. The EOP SDT will be required to have each standard’s commenting and balloting conducted separately; however, since the revisions and retirements of requirements are being developed concurrently, the standards will likely post for commenting and balloting during the same time periods. The EOP SDT would not be allowed to ballot requirements and/or attachments separately from the standard they are contained within. Each standard would need to pass or fail ballot in its entirety. The EOP SDT will consider whether an informal comment period would be beneficial for each standard; in particular EOP-004 (due to attachments) during the development process, or whether focused outreach to gather industry inputs during development is more efficient and effective.

John Williams - Tallahassee Electric (City of Tallahassee, FL) - 3 -

Selected Answer: Yes

Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC

Group Name: NPCC--Project 2015-08

Group Member Name	Entity	Region	Segments

Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Rob Vance	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5
Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8

RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

Selected Answer: Yes

Answer Comment:

We have the following concerns for EOP-004:

There is a need to clarify the obligations of the Responsible Entities listed in Attachment 1.

On page 10 of EOP-004-2, when there is a loss of firm load ≥ 300 MW for entities with a previous year's demand $\geq 3,000$ MW, or ≥ 200 MW for all other entities, the BA, TOP or DP is held responsible for reporting. It is unclear as to the MW in relation to which particular entity's previous year's demand, and whether or not all three entities are responsible for reporting, or just one of them needs to report, and if so, which one of the three? Also, if it is meant to be one of the three, it is not clear whether or not the location or area within which the load loss occurs would dictate which one of the three entities has that obligation.

When the loss of load occurs in a distribution system, is it the DP's obligation to report? Likewise, is the TOP obligated to report when the loss involves those loads that are tapped off the transmission network? Depending on the answer to the above, what is the role of the BA? If all three are obligated to report, the requirement makes it cumbersome and redundant to have all three entities file reports to the recipient entities/authorities.

Response:

Thank you for your comments. The EOP SDT will review comments/recommendations made to the EOP PRT during comment period of final recommendations (as well as these SAR comments), as many received had merit and the EOP SDT intends to make a thorough review of these comments in consideration of developing the revisions to the standards.

Ben Engelby - ACES Power Marketing - 6 -

Group Name: ACES Standards Collaborators - EOP Project

Group Member Name	Entity	Region	Segments
Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	RFC	1
John Shaver	Arizona Electric Power Cooperative, Inc. Southwest Transmission Cooperative, Inc.	WECC	1,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Kevin Lyons	Central Iowa Power Cooperative	MRO	1
Ginger Mercier	Prairie Power, Inc.	SERC	3
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4

Selected Answer: Yes

Jared Shakespeare - Peak Reliability - 1 -

Selected Answer: Yes

Answer Comment:

EOP-004 – agree with retiring R3 (annual validation of contacts listed in event reporting operating plan) and with suggested changes throughout the standard (providing clarity for who is responsible for reporting)

EOP-005 – Agree with the EOP PRT to *not* retire R12 as it is *not* duplicative with PER-005-1 R3.

Agree with including R7 and R8 into R1

Agree with removing R3.1 which was retired by FERC on 1/21/14

Agree that R10 could possibly be moved to the PER standards if R12 remains in EOP-005

EOP-006 – neutral on retiring R1.2, R1.3, and R1.4 due to redundancy with R1.5

Agree with not retiring R10 as it is not captured in PER-005

Agree with including R7 and R8 into R1

Neutral on recommendation to add time frame for R4 (review of neighboring RC restoration plans)

Agree that R9 could possibly be moved to the PER standards if R10 remains in EOP-006

Agree more precise expectations should be included in R10.1 (GOPs must participate in RC training exercise...), would prefer that only black start GOPs must attend the RC restoration training drills

EOP-008 – Agree with adding clarity to timing or removing the statement in R1.1

Response: The EOP SDT appreciates your support of the EOP PRT's final recommendations.

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Selected Answer: No

Answer Comment: In regard to the Project 2015-02 PRT's recommendations, BPA disagrees with:

1 - EOP-004: R1 VSL change increase

2 - EOP-004 Attachment 1: eliminating GOP from reporting, BPA believes it should be by initiating BA or initiating GOP. If a major plant has an internal problem and trips the GOP should do the investigation (not the BA).

3 - EOP-005: Page 5 "#2 Clarity" (version 2 R5 already uses "implementation date"), with R6 change.

4 - EOP-005: elimination of "Blackstart Resources" from R7 & R8.

Response: Thank you for your comments.
 EOP-004, Requirement R1: The EOP SDT will implement the recommendation of the EOP PRT by reviewing the VSL in Requirement R1 to determine if it should be revised for consistency with the VSL level in Requirement R2. The EOP SDT will consider all comments received on this revision prior to determining the appropriate action to take on the revision.

 EOP-004, Attachment 1: The EOP SDT will review comments/recommendations made to the EOP PRT during comment period of final recommendations (as well as these SAR comments), as many received had merit and the EOP SDT intends to make a thorough review of these comments in consideration of developing the revisions to the standards/attachments.

EOP-005: The EOP PRT’s intent for the review for revision of Requirement R5 was to consider the current language of “implementation date” and consider if the use of the term “effective date,” or “approval date” would provide additional clarity, or if the current language “implementation date” is clear as written.
 EOP-005: Requirements R7 and R8 (Blackstart Resources). The EOP SDT is unclear as to your comment regarding these requirements. The EOP PRT did not make a recommendation for elimination of Blackstart Resources from Requirements R7 and R8; rather the recommendation was to review these two requirements for possible merging into Requirement R1.

2. The SAR identifies a list of reliability functions that may be assigned responsibility for requirements in the set of standards addressed by this SAR. Do you agree with the list of proposed applicable functional entities? If no, please explain.

Summary Responses:

Many commenters made comments and recommendations for revisions to EOP-004, Attachment 1: The EOP SDT will review comments/recommendations made to the EOP PRT during comment period of final recommendations (as well as these SAR comments), as many received had merit and the EOP SDT intends to make a thorough review of these comments in consideration of developing the revisions to the standards.

Louis Slade - Dominion - Dominion Resources, Inc. - 6 -

Group Name: Dominion NCP

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	NPCC	5,6
Randi Heise	NERC Compliance Policy	SERC	1,3,5,6
Connie Lowe	NERC Compliance Policy	SERC	1,3,5,6
Louis Slade	NERC Compliance Policy	RFC	5,6

Selected Answer: Yes

Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO

Group Name: MRO-NERC Standards Review Forum (NSRF)

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

Selected Answer: Yes

John Fontenot - Bryan Texas Utilities - 1 -

Selected Answer: Yes

Leonard Kula - Independent Electricity System Operator - 2 -

Selected Answer: Yes

christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -

Selected Answer: Yes

Answer Comment:

ERCOT agrees with the functional assignments, but reiterates its comments submitted in response to the periodoc review recommendations that redundancy across functions is inefficient and onerous and should be re-evaluated.

Response:

Thank you for your comments. The EOP SDT will review comments/recommendations made to the EOP PRT during comment period (as well as these SAR comments), as many received had merit and the EOP SDT intends to make a thorough review of these comments in consideration of developing the revisions to the standards.

Thomas Foltz - AEP - 5 -

Selected Answer: Yes

Randi Heise - Dominion - Dominion Resources, Inc. - 5 -

Group Name: Dominion - RCS

Group Member Name	Entity	Region	Segments
Larry Nash	Dominion Virginia Power	SERC	1
Louis Slade	Dominion Resources, Inc.	SERC	6
Connie Lowe	Dominion Resources, Inc.	RFC	3
Randi Heise	Dominion Resources, Inc,	NPCC	5

Selected Answer: Yes

Ben Li - Independent Electricity System Operator - 2 - NPCC

Group Name: ISO/RTO Council Standards Review Committee

Group Member Name	Entity	Region	Segments
Charles Yeung	SPP	SPP	2
Greg Campoli	NYISO	NPCC	2
Ali Miremadi	CAISO	WECC	2
Ben Li	IESO	NPCC	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Terry Bilke	MISO	MRO	2

Selected Answer: Yes

Scott Langston - Tallahassee Electric (City of Tallahassee, FL) - 1 -

Selected Answer: Yes

Karen Webb - Tallahassee Electric (City of Tallahassee, FL) - 5 -

Selected Answer: Yes

Nick Vtyurin - Manitoba Hydro - 1,3,5,6 - MRO

Selected Answer: Yes

Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC

Group Name: Duke Energy

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

Selected Answer: Yes

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

Selected Answer: Yes

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP

Group Name: SPP Standards Review Group

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool Inc.	SPP	2
Jason Smith	Southwest Power Pool Inc	SPP	2
Carl Stelly	Southwest Power Pool Inc	SPP	2
Mike Kidwell	Empire District Electric Company	SPP	1,3,5
Ashley Stringer	Oklahoma Municipal Power Authority	SPP	4
James "Jim" Nail	City of Independence, Missouri	SPP	3,5
Ellen Watkin	Sunflower Electric Power Corporation	SPP	1

Selected Answer: Yes

John Williams - Tallahassee Electric (City of Tallahassee, FL) - 3 -

Selected Answer: Yes

Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC

Group Name: NPCC--Project 2015-08

Group Member Name	Entity	Region	Segments
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Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Rob Vance	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5
Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8

RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

Selected Answer: Yes

Ben Engelby - ACES Power Marketing - 6 -

Group Name: ACES Standards Collaborators - EOP Project

Group Member Name	Entity	Region	Segments
Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	RFC	1
John Shaver	Arizona Electric Power Cooperative, Inc. Southwest Transmission Cooperative, Inc.	WECC	1,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Kevin Lyons	Central Iowa Power Cooperative	MRO	1
Ginger Mercier	Prairie Power, Inc.	SERC	3
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4

Selected Answer: Yes

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Selected Answer: Yes

3. Are you aware of any regional variances that will be needed as a result of this project? If yes, please identify the regional variance:

Summary Responses:

All commenters responded “No.” No regional variances are identified by comments.

Louis Slade - Dominion - Dominion Resources, Inc. - 6 -

Group Name: Dominion NCP

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	NPCC	5,6
Randi Heise	NERC Compliance Policy	SERC	1,3,5,6
Connie Lowe	NERC Compliance Policy	SERC	1,3,5,6
Louis Slade	NERC Compliance Policy	RFC	5,6

Selected Answer: No

Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO

Group Name: MRO-NERC Standards Review Forum (NSRF)

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

Selected Answer: No

John Fontenot - Bryan Texas Utilities - 1 -

Selected Answer: No

Leonard Kula - Independent Electricity System Operator - 2 -

Selected Answer: No

christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -

Selected Answer: No

Thomas Foltz - AEP - 5 -

Selected Answer: No

Randi Heise - Dominion - Dominion Resources, Inc. - 5 -

Group Name: Dominion - RCS

Group Member Name	Entity	Region	Segments
Larry Nash	Dominion Virginia Power	SERC	1
Louis Slade	Dominion Resources, Inc.	SERC	6
Connie Lowe	Dominion Resources, Inc.	RFC	3
Randi Heise	Dominion Resources, Inc,	NPCC	5

Selected Answer: No

Ben Li - Independent Electricity System Operator - 2 - NPCC

Group Name: ISO/RTO Council Standards Review Committee

Group Member Name	Entity	Region	Segments
Charles Yeung	SPP	SPP	2
Greg Campoli	NYISO	NPCC	2
Ali Miremadi	CAISO	WECC	2
Ben Li	IESO	NPCC	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Terry Bilke	MISO	MRO	2

Selected Answer: No

Scott Langston - Tallahassee Electric (City of Tallahassee, FL) - 1 -

Selected Answer: No

Karen Webb - Tallahassee Electric (City of Tallahassee, FL) - 5 -

Selected Answer: No

Nick Vtyurin - Manitoba Hydro - 1,3,5,6 - MRO

Selected Answer: No

Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC

Group Name: Duke Energy

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

Selected Answer: No

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

Selected Answer: No

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP

Group Name: SPP Standards Review Group

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool Inc.	SPP	2
Jason Smith	Southwest Power Pool Inc	SPP	2
Carl Stelly	Southwest Power Pool Inc	SPP	2
Mike Kidwell	Empire District Electric Company	SPP	1,3,5
Ashley Stringer	Oklahoma Municipal Power Authority	SPP	4
James "Jim" Nail	City of Independence, Missouri	SPP	3,5

Ellen Watkin	Sunflower Electric Power Corporation	SPP	1
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Selected Answer: No

John Williams - Tallahassee Electric (City of Tallahassee, FL) - 3 -

Selected Answer: No

Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC

Group Name: NPCC--Project 2015-08

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Rob Vance	New Brunswick Power Corporation	NPCC	9

Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5
Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

Selected Answer: No

Ben Engelby - ACES Power Marketing - 6 -

Group Name: ACES Standards Collaborators - EOP Project

Group Member Name	Entity	Region	Segments
Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	RFC	1
John Shaver	Arizona Electric Power Cooperative, Inc. Southwest Transmission Cooperative, Inc.	WECC	1,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Kevin Lyons	Central Iowa Power Cooperative	MRO	1
Ginger Mercier	Prairie Power, Inc.	SERC	3
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4

Selected Answer: No

Jared Shakespeare - Peak Reliability - 1 -

Selected Answer: No

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Selected Answer: No

4. Are you aware of any business practice that will be needed or that will need to be modified as a result of this project? If yes, please identify the business practice:

Summary Responses:

No business practice was identified as being needed or modified as a result of Project 2015-08 Emergency Operations.

Louis Slade - Dominion - Dominion Resources, Inc. - 6 -

Group Name: Dominion NCP

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	NPCC	5,6
Randi Heise	NERC Compliance Policy	SERC	1,3,5,6
Connie Lowe	NERC Compliance Policy	SERC	1,3,5,6
Louis Slade	NERC Compliance Policy	RFC	5,6

Selected Answer: No

Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO

Group Name: MRO-NERC Standards Review Forum (NSRF)

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6

Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

Selected Answer: No

John Fontenot - Bryan Texas Utilities - 1 -

Selected Answer: No

Leonard Kula - Independent Electricity System Operator - 2 -

Selected Answer: No

christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -

Selected Answer: No

Randi Heise - Dominion - Dominion Resources, Inc. - 5 -

Group Name: Dominion - RCS

Group Member Name	Entity	Region	Segments
Larry Nash	Dominion Virginia Power	SERC	1
Louis Slade	Dominion Resources, Inc.	SERC	6
Connie Lowe	Dominion Resources, Inc.	RFC	3
Randi Heise	Dominion Resources, Inc,	NPCC	5

Selected Answer: No

Ben Li - Independent Electricity System Operator - 2 - NPCC

Group Name: ISO/RTO Council Standards Review Committee

Group Member Name	Entity	Region	Segments
Charles Yeung	SPP	SPP	2
Greg Campoli	NYISO	NPCC	2
Ali Miremadi	CAISO	WECC	2
Ben Li	IESO	NPCC	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Terry Bilke	MISO	MRO	2

Selected Answer: No

Scott Langston - Tallahassee Electric (City of Tallahassee, FL) - 1 -

Selected Answer: No

Karen Webb - Tallahassee Electric (City of Tallahassee, FL) - 5 -

Selected Answer: No

Nick Vtyurin - Manitoba Hydro - 1,3,5,6 - MRO

Selected Answer: No

Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC

Group Name: Duke Energy

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

Selected Answer: Yes

Answer Comment: Without knowing the extent of the changes that will incur from this project, we are unable to provide specific examples of business practices that will be needed, or will need modification as a result of this project. However, it can be reasonably inferred that some business practices such as notification protocols, as well as

operational procedures are going to need some modification depending on the extent of the revisions proposed.

Response:

Thank you for your comment. For clarification, the specific question related to NAESB business practices; and not such things as operational protocols/procedures.

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

Selected Answer: No

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP

Group Name: SPP Standards Review Group

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool Inc.	SPP	2
Jason Smith	Southwest Power Pool Inc	SPP	2
Carl Stelly	Southwest Power Pool Inc	SPP	2
Mike Kidwell	Empire District Electric Company	SPP	1,3,5
Ashley Stringer	Oklahoma Municipal Power Authority	SPP	4
James "Jim" Nail	City of Independence, Missouri	SPP	3,5
Ellen Watkin	Sunflower Electric Power Corporation	SPP	1

Selected Answer: No

John Williams - Tallahassee Electric (City of Tallahassee, FL) - 3 -

Selected Answer:

No

Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC

Group Name:

NPCC--Project 2015-08

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Rob Vance	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5
Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5

Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

Selected Answer: No

Ben Engelby - ACES Power Marketing - 6 -

Group Name: ACES Standards Collaborators - EOP Project

Group Member Name	Entity	Region	Segments
Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	RFC	1

John Shaver	Arizona Electric Power Cooperative, Inc. Southwest Transmission Cooperative, Inc.	WECC	1,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Kevin Lyons	Central Iowa Power Cooperative	MRO	1
Ginger Mercier	Prairie Power, Inc.	SERC	3
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4

Selected Answer: No

Jared Shakespeare - Peak Reliability - 1 -

Selected Answer: No

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Selected Answer: No

5. Are you aware of any Canadian provincial or other regulatory requirements that may need to be considered during this project in order to develop a continent-wide approach to the standard(s)? If yes, please identify the jurisdiction and specific regulatory requirements.

Summary Responses:

In response to the comment received to coordinate Event Reporting obligations across agencies, the EOP PRT intends to address potential efficiencies to be gained between EOP-004, ERO Event Analysis Process, and the U.S. Department of Energy’s (DOE) OE-417 report and recommends that the EOP SDT review for possible better alignment. Following extensive discussion regarding

the relationship between EOP-004-2 reporting and the DOE OE-417 report, the EOP SDT has entered into an ongoing collaborative effort with the DOE to better align reporting requirements for U.S. entities.

Louis Slade - Dominion - Dominion Resources, Inc. - 6 -

Group Name: Dominion NCP

Group Member Name	Entity	Region	Segments
Mike Garton	NERC Compliance Policy	NPCC	5,6
Randi Heise	NERC Compliance Policy	SERC	1,3,5,6
Connie Lowe	NERC Compliance Policy	SERC	1,3,5,6
Louis Slade	NERC Compliance Policy	RFC	5,6

Selected Answer: No

Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO

Group Name: MRO-NERC Standards Review Forum (NSRF)

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6

Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

Selected Answer: No

John Fontenot - Bryan Texas Utilities - 1 -

Selected Answer: No

Leonard Kula - Independent Electricity System Operator - 2 -

Selected Answer: Yes

Answer Comment: The Ontario Energy Board (Ontario energy regulator) has in place electricity reporting requirements for Ontario distribution providers. Loss of Supply is an electricity reporting requirement that is filed by Ontario distribution providers to the Ontario Energy Board (and not the Ontario IESO which is the RC, BA and TOP for the Ontario integrated grid).

Response: Thank you for your comment.

christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -

Selected Answer: Yes

Answer Comment: The Public Utility Commission of Texas has both emergency and outage reporting forms and requirements.

Response: Thank you for your comment.

Thomas Foltz - AEP - 5 -

Selected Answer: No

Randi Heise - Dominion - Dominion Resources, Inc. - 5 -

Group Name: Dominion - RCS

Group Member Name	Entity	Region	Segments
Larry Nash	Dominion Virginia Power	SERC	1
Louis Slade	Dominion Resources, Inc.	SERC	6
Connie Lowe	Dominion Resources, Inc.	RFC	3
Randi Heise	Dominion Resources, Inc,	NPCC	5

Selected Answer: No

Ben Li - Independent Electricity System Operator - 2 - NPCC

Group Name: ISO/RTO Council Standards Review Committee

Group Member Name	Entity	Region	Segments
Charles Yeung	SPP	SPP	2
Greg Campoli	NYISO	NPCC	2
Ali Miremadi	CAISO	WECC	2
Ben Li	IESO	NPCC	2
Kathleen Goodman	ISO-NE	NPCC	2
Mark Holman	PJM	RFC	2
Terry Bilke	MISO	MRO	2

Selected Answer: Yes

Answer Comment: The Ontario Energy Board (Ontario energy regulator) has in place electricity reporting requirements for Ontario distribution providers. Loss of Supply is an electricity reporting requirement that is filed by Ontario distribution providers to the Ontario Energy Board.

The Public Utility Commission of Texas has both emergency and outage reporting forms and requirements.

Response: Thank you for your comments.

Scott Langston - Tallahassee Electric (City of Tallahassee, FL) - 1 -

Selected Answer: No

Karen Webb - Tallahassee Electric (City of Tallahassee, FL) - 5 -

Selected Answer: No

Nick Vtyurin - Manitoba Hydro - 1,3,5,6 - MRO

Selected Answer: No

Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC

Group Name: Duke Energy

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

Selected Answer: No

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

Selected Answer: No

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP

Group Name: SPP Standards Review Group

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool Inc.	SPP	2
Jason Smith	Southwest Power Pool Inc	SPP	2
Carl Stelly	Southwest Power Pool Inc	SPP	2
Mike Kidwell	Empire District Electric Company	SPP	1,3,5
Ashley Stringer	Oklahoma Municipal Power Authority	SPP	4
James "Jim" Nail	City of Independence, Missouri	SPP	3,5
Ellen Watkin	Sunflower Electric Power Corporation	SPP	1

Selected Answer: No

John Williams - Tallahassee Electric (City of Tallahassee, FL) - 3 -

Selected Answer: No

Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC

Group Name: NPCC--Project 2015-08

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3

Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Rob Vance	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5
Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5

Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

Selected Answer: Yes

Answer Comment:

An effort to coordinate Event Reporting obligations across agencies should be undertaken. Currently, entities are required to report to NERC and to the DOE, potentially in different time frames and with a different level of detail. If these could be made more consistent moving forward, it would reduce the administrative burdens associated with Event Reporting. This should be added to the scope of the SAR for consideration.

The Ontario Energy Board (Ontario energy regulator) has in place electricity reporting requirements for Ontario distribution providers. Loss of Supply is an electricity reporting requirement that is filed by Ontario distribution providers to the Ontario Energy Board (and not the Ontario IESO which is the RC, BA and TOP for the Ontario integrated grid).

Response:

Thank you for your comments.

Event Reporting obligations: In response to the comment received to coordinate Event Reporting obligations across agencies, the EOP PRT intends to address potential efficiencies to be gained between EOP-004, ERO Event Analysis Process, and the U.S. Department of Energy’s (DOE) OE-417 report and recommends that the EOP SDT review for possible better alignment. Following extensive discussion regarding the relationship between EOP-004-2 reporting and the DOE OE-417 report, the EOP SDT has entered into an ongoing collaborative effort with the DOE to better align reporting requirements for U.S. entities.

Ben Engelby - ACES Power Marketing - 6 -

Group Name: ACES Standards Collaborators - EOP Project

Group Member Name	Entity	Region	Segments
Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	RFC	1
John Shaver	Arizona Electric Power Cooperative, Inc. Southwest Transmission Cooperative, Inc.	WECC	1,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Kevin Lyons	Central Iowa Power Cooperative	MRO	1
Ginger Mercier	Prairie Power, Inc.	SERC	3
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4

Selected Answer: No

Jared Shakespeare - Peak Reliability - 1 -

Selected Answer: No

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Selected Answer:

No

6. If you have any other comments on this SAR that you haven't already mentioned above, please provide them here.

Summary Responses:

Many commenters made comments and recommendations for revisions to EOP-004, Attachment 1: The EOP SDT will review comments/recommendations made to the EOP PRT during comment period of final recommendations (as well as these SAR comments), as many received had merit and the EOP SDT intends to make a thorough review of these comments in consideration of developing the revisions to the standards.

The EOP SDT will continue to review the rationale box for dynamic simulations and any other comments that industry provides in the future.

In response to the comment received to coordinate Event Reporting obligations across agencies, the EOP PRT intends to address potential efficiencies to be gained between EOP-004, ERO Event Analysis Process, and the U.S. Department of Energy's (DOE) OE-417 report and recommends that the EOP SDT review for possible better alignment. Following extensive discussion regarding the relationship between EOP-004-2 reporting and the DOE OE-417 report, the EOP SDT has entered into an ongoing collaborative effort with the DOE to better align reporting requirements for U.S. entities.

Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO

Group Name:

MRO-NERC Standards Review Forum (NSRF)

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1

Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

Answer Comment:

The NSRF has reviewed the Project page containing the proposed redlined to last approved Standards and believes this is a good starting point for the SDT to complete this project.

Response: Thank you for your comment.

Thomas Foltz - AEP - 5 -

Answer Comment:

The purpose/goal for the SAR associated with Project 2015-08 (Emergency Operations) states in part "...implement the recommendations of the Project 2015-02 EOP PRT to revise EOP-004-2, EOP-005-2, EOP-006-2, and EOP-008-1". Page 4 of the Project 2015-02 EOP PRT report on PRC-005-2 has a list of items for consideration. Our comments below are in response to some of the recommendations made in this report.

Item b states that "the EOP PRT recommends the future SDT consider findings from any future-published reports as they relate to EOP-005-2." We also suggest reaching out to the North American Transmission Forum for input as appropriate.

Item h states that "the EOP PRT recommends the future SDT review Requirement R6 for clarification of the terms "steady state" and "dynamic simulations, including considering the addition of a Rationale Box." We believe there is need for practicality regarding the addition of a Rationale Box to clarify dynamic simulations . System restoration is not defined as restoring power to each and every load. Rather, EOP-005-2 R1 uses practical language which states that the completion of system restoration is "...a state whereby the choice of the next Load to be restored is not driven by the need to control frequency or voltage...".

Response:

Thank you for your comments.

The EOP SDT will consider gathering inputs from the North American Transmission Forum (NATF), where appropriate, during development of revisions and retirements of these standards.

The EOP SDT will continue to review the rationale box for dynamic simulations and any other comments that industry provides in the future.

Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC

Group Name:

Duke Energy

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

Answer Comment:

While Duke Energy supports the project, we have concerns for the potential of “scope creep” due to the broad implications of the EOP-004 attachment on the requirements of reporting. There could be potential for the Drafting Team to become bogged down in trying to coordinate between Event Analysis reporting and OE-417 reporting. The Drafting Team should be given clear direction on what needs to be modified as part of the project.

Response:

Thank you for your comment.

Event Reporting obligations: In response to the comment received to coordinate Event Reporting obligations across agencies, the EOP PRT intends to address potential efficiencies to be gained between EOP-004, ERO Event Analysis Process, and the U.S. Department of Energy’s (DOE) OE-417 report and recommends that the EOP SDT review for possible better alignment. Following extensive discussion regarding the relationship between EOP-004-2 reporting and the DOE OE-417 report, the EOP SDT has entered into an ongoing collaborative effort with the DOE to better align reporting requirements for U.S. entities.

Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC

Group Name:

NPCC--Project 2015-08

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Rob Vance	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5
Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Energy Services, Inc.	NPCC	5

Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
Robert Pellegrini	The United Illuminating Company	NPCC	1

Answer Comment:

In the Detailed Description section of the SAR, the sentence “There are no market interface impacts resulting from the standard action on the implementation of the Project 2015-02, EOP PRT’s recommendations.” should be revised. There are no direct impacts to the market interface from “the standard action on the implementation of the Project 2015-02, EOP PRT’s recommendations.”

“The EOP Periodic Review Team (EOP PRT) is recommending that the future Standards Drafting Team (SDT) revise Requirement 1 part R1.1 to provide clarity, as the team determined it would be difficult to establish a timing requirement to restore primary control center functionality given the range of events that could render the primary control center inoperable”. Considering a system reliability need for generation, there are entities that have market interface equipment in their primary control center only. If the primary control center becomes inoperable it will have an effect on how fast an entity is able to get generation online in order for support. Please change the language to “direct impacts” instead.

It is recognized that continued operation of a market is not a reliability issue; in this situation, manual dispatch should continue to occur.

Suggest that any update to EOP-004-2 should include a re-synchronization of the EOP-004’s Attachment 1 (Reportable Events) with the list of Categories in the ERO’s

Event Analysis Process – Version 3 document. Any change to EOP-004 going forward should consider the latest version of the EAP.

Response:

Thank you for your comments. The EOP SDT will review comments/recommendations made to the EOP PRT during comment period of final recommendations (as well as these SAR comments), as many received had merit and the EOP SDT intends to make a thorough review of these comments in consideration of developing the revisions to the standards.

Ben Engelby - ACES Power Marketing - 6 -

Group Name: ACES Standards Collaborators - EOP Project

Group Member Name	Entity	Region	Segments
Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	RFC	1
John Shaver	Arizona Electric Power Cooperative, Inc. Southwest Transmission Cooperative, Inc.	WECC	1,4,5
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Kevin Lyons	Central Iowa Power Cooperative	MRO	1
Ginger Mercier	Prairie Power, Inc.	SERC	3
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4

Answer Comment:

We recommend that the drafting team consider whether there are opportunities to carve out lower risk entities from the applicability section in the standard. This would be consistent with the approaches of the Risk Based Registration initiative by right-sizing compliance responsibilities for low-risk entities.

Response:

Thank you for your comment. The EOP SDT will review comments/recommendations made to the EOP PRT during comment period of final recommendations (as well as these SAR comments).

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Comment:

N/A