

Consideration of Comments on Initial Ballot — RECM Interpretation — EOP-001-0 (Project 2008-09)

Summary Consideration: An initial ballot of an interpretation of EOP-001-0, Requirement R1 was conducted from April 15-26, 2010 and achieved a quorum and a weighted approval of 98.64%. There were only two ballots submitted with negative comments, as shown in the table below. The ORS Executive Committee (Interpretation Drafting Team) disagrees with the comments included with the two negative ballots received. No changes were made to the interpretation following the initial ballot.

If you feel that the drafting team overlooked your comments, 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 Vice President and Director of Standards, Herbert Schrayshuen, at 609-452-8060 or at herb.schrayshuen@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

Voter	Entity	Segment	Vote	Comment
Ralph Frederick Meyer	Empire District Electric Co.	1	Affirmative	Very good interpretation. Very Logical. This clears up uncertainty with this standard.
Response: The ORS Executive Committee thanks Empire District Electric Co. its comment.				
Kevin Query	FirstEnergy Solutions	3	Affirmative	No Comment
Response: The ORS Executive Committee thanks FirstEnergy Solutions for its Affirmative vote.				
Karl Bryan	U.S. Army Corps of Engineers Northwestern Division	5	Negative	It appears that the SDT is rewriting the Rel Stndrd by defining "emergency assistance" to mean "emergency energy" whereas emergency assistance can also imply physical assistance, technical support, etc... Also, since when does a plural mean a singular? "Balancing Authorities shall have agreements with adjacent Balancing Authorities", this implies multiple agreements with multiple BAs. Making this singular is rewriting the Rel Stndrd and is beyond the scope of the SDT in performing interpretations.
Response: The interpretation is not redefining emergency assistance. The request for interpretation is in the context of Requirement R1. The ORS Executive Committee believes emergency assistance is limited to emergency energy. In the context of R1, it does not include other physical assistance (i.e., mutual assistance agreements) entities may have with their neighbors. The ORS Executive Committee is not rewriting R1. In addition, in the context of R1, the ORS Executive Committee has interpreted Balancing Authorities to mean "at least one."				
Martin Bauer P.E.	U.S. Bureau of Reclamation	5	Negative	The Standards Drafting Team (SDT) interprets the standard that "emergency assistance" is "emergency energy". In its interpretation, the SDT introduced the term "emergency energy assistance" in place of the "emergency assistance" when it refers to language in the standard. This modifies the language of the standard which is not appropriate. Emergency assistance is undefined and can be any arrangement not limited to energy. The SDT interprets the standard to

¹ The appeals process is in the Reliability Standards Development Procedure: http://www.nerc.com/files/RSDP_V6_1_12Mar07.pdf.

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				<p>mean agreements with at least one adjacent BA. This would not be consistent with the language which uses plural form of BA, meaning more than one BA. The interpretation should have pointed out that there must be agreements with more than one adjacent BA. Finally, there is no basis cited for these interpretations. It also does not follow the interpretations by other teams which relied strictly on the text of the requirement or documents directly connected with the standard.</p>
<p>Response: The interpretation is not redefining emergency assistance. The request for interpretation is in the context of Requirement R1. The ORS Executive Committee believes emergency assistance is limited to emergency energy. In the context of R1, it does not include other physical assistance (i.e., mutual assistance agreements) entities may have with their neighbors. The ORS Executive Committee is not rewriting R1. In addition, in the context of R1, the ORS Executive Committee has interpreted Balancing Authorities to mean "at least one."</p>				