

Review of EOP-006-2—System Restoration Coordination (Deferred/Filing 2)

<http://www.nerc.com/files/EOP-006-2.pdf>

VRFs for Requirements R6 and R9:

Standard, Requirement	Requirement Language	VRF Assignment	Original Guideline-Based Explanation for Assignment (from P. 29 of December 31, 2009 filing)	Comments
EOP-006-2, R6	Each Reliability Coordinator shall have a copy of its latest restoration plan and copies of the latest approved restoration plan of each Transmission Operator in its Reliability Coordinator Area within its primary and backup control rooms so that it is available to all of its System Operators prior to the implementation date.	Medium <u>Lower</u>	A lower VRF was given to Requirements R2 and R6 because these requirements are primarily administrative in nature.	<p>FERC cited a possible inconsistency with Guideline 4, stating that the requirement is arguably not purely administrative.</p> <p><u>While Upon further review of all EOP VRF assignments, NERC staff does believe has determined that the VRF should remain Lower, as originally proposed by the drafting team. This requirement addresses is simply about the possession of a task that is, in document and of itself, is administrative, it recognizes that the implications could be more than. A Reliability Coordinator's ability to implement its plan is</u></p>

				<u>covered in R7 and thus is separate from the administrative.</u> Accordingly, NERC staff proposes changing the VRF to <u>Medium</u> requirement of <u>having a copy of the plan.</u>
EOP-006-2, R9	<p>Each Reliability Coordinator shall include within its operations training program, annual System restoration training for its System Operators to assure the proper execution of its restoration plan. This training program shall address the following:</p> <p>R9.1. The coordination role of the Reliability Coordinator.</p> <p>R9.2. Reestablishing the Interconnection.</p>	Medium	A medium VRF was assigned to Requirements R3, R4, R5, R9 and R10 on the basis that these items were not considered as directly leading to BPS instability.	<p>FERC cited a Guideline 1 issue, stating that the requirement might need a higher VRF because it deals with topics cited in the Final Blackout Report and, thus, could directly contribute to BPS instability.</p> <p>NERC staff continues to support the drafting team’s Medium VRF assignment. Failure to provide training, while important, would not directly lead to instability, etc. NERC staff believes the VRF assignment should remain a Medium.</p>

VSLs for Requirements R6:

Standard, Requirement	Requirement Language	Lower	Moderate	High	Severe	Comments
EOP-006-2, R6	Each Reliability Coordinator shall have a copy of its			The Reliability	The Reliability	Citing a Guideline 2 concern, FERC pointed out that

	latest restoration plan and copies of the latest approved restoration plan of each Transmission Operator in its Reliability Coordinator Area within its primary and backup control rooms so that it is available to all of its System Operators prior to the implementation date.			Coordinator did not have a copy of the latest approved restoration plan of all Transmission Operators in its Reliability Coordinator Area within its primary and backup control rooms prior to the implementation date.	Coordinator did not have a copy of its latest restoration plan within its primary and backup control rooms prior to the implementation date.	EOP-006-2, R6 is similar to EOP-005-2, R5 , which has a binary VSL. They encouraged staff to consider a similar binary set-up. NERC staff agreed with FERC that the intervals in the VSLs were not appropriate, but believes that there still is some opportunity for gradation and has redlined the VSLs accordingly.
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Original Guideline Explanation for R6 VSLs in [December 1, 2010 VSL Filing 2](#):

No changes in VSLs from the previously filed version of the standard.

- *Guideline 1*: P. 881-882 of Guideline 1 Analysis in [March 5, 2012 VSL Filing 1](#)
- *Guideline 2*: N/A (was blank in filing – need to look into this)
- *Guideline 3*: NERC compared the existing VSLs to the stated requirement language to ensure the VSLs do not redefine or undermine the reliability goal of the requirement. In accordance with Guideline 3, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.

- *Guideline 4:* The VSL assignments comply with Guideline 4, because they are based on a single violation of a Reliability Standard and are not based on a cumulative number of violations of the same requirement over a period of time

VSLs for Requirements R7:

Standard, Requirement	Requirement Language	Lower	Moderate	High	Severe	Comments
EOP-006-2, R7	Each Reliability Coordinator shall work with its affected Generator Operators, and Transmission Operators as well as neighboring Reliability Coordinators to monitor restoration progress, coordinate restoration, and take actions to restore the BES frequency within acceptable operating limits. If the restoration plan cannot be completed as expected the Reliability Coordinator shall	N/A	N/A	N/A	<p>The Reliability Coordinator did not work with its affected Generator Operators and Transmission Operators as well as neighboring Reliability Coordinators to monitor restoration progress, coordinate restoration, and take actions to restore the BES frequency within acceptable operating limits.</p> <p>OR</p> <p>When the restoration plan</p>	<p>FERC asked what would happen if the RC did not utilize its restoration plan strategy as described at the end of R7. In other words, the last sentence of the requirement is not accounted for in the VSLs.</p> <p>NERC staff agreed with FERC staff and incorporated the last sentence of the requirement into the VSLs.</p>

	utilize its restoration plan strategies to facilitate System restoration.				cannot be completed as expected, the Reliability Coordinator did not utilize its restoration plan strategies to facilitate System restoration.	
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Original Guideline Explanation for R7 VSLs in [December 1, 2010 VSL Filing 2](#):

No changes in VSLs from the previously filed version of the standard.

- *Guideline 1:* P. 881-882 of Guideline 1 Analysis in [March 5, 2012 VSL Filing 1](#)
- *Guideline 2:* The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. Additionally, NERC has reviewed the VSL text and has determined that, as written, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.
- *Guideline 3:* NERC compared the existing VSLs to the stated requirement language to ensure the VSLs do not redefine or undermine the reliability goal of the requirement. In accordance with Guideline 3, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.
- *Guideline 4:* The VSL assignments comply with Guideline 4, because they are based on a single violation of a Reliability Standard and are not based on a cumulative number of violations of the same requirement over a period of time.

VSLs for Requirements R8:

Standard, Requirement	Requirement Language	Lower	Moderate	High	Severe	Comments
EOP-006-2, R8	The Reliability Coordinator shall coordinate or authorize resynchronizing islanded areas that bridge boundaries between Transmission Operators or Reliability Coordinators. If the resynchronization cannot be completed as expected the Reliability Coordinator shall utilize its restoration plan strategies to facilitate resynchronization.	N/A	N/A	N/A	<p>The Reliability Coordinator did not coordinate or authorize resynchronizing islanded areas that bridge boundaries between Transmission Operators or Reliability Coordinators.</p> <p>OR</p> <p>If the resynchronization could not be completed as expected, the Reliability Coordinator did not utilize its restoration plan strategies to facilitate resynchronization.</p>	<p>As in R7, FERC staff pointed out that the second sentence of the VSL is not accounted for in the VSL assignments.</p> <p>NERC staff agreed with FERC staff and incorporated the last sentence of the requirement into the VSLs.</p>

Original Guideline Explanation for R8 VSLs in [December 1, 2010 VSL Filing 2](#):

The VSLs were modified from the previously filed version 2 of the standard to be consistent with Guideline 2.

- *Guideline 1*: P. 881-882 of Guideline 1 Analysis in [March 5, 2012 VSL Filing 1](#)
- *Guideline 2*: The VSLs were modified to be consistent with FERC Guideline 2b. Additionally, NERC has reviewed the VSL text and has determined that, as originally written, the VSL could have been misinterpreted to require the Reliability Coordinator to authorize resynchronizing, while the intent of the requirement is to require the Reliability Coordinator to determine when resynchronizing should occur. The VSL was modified to correct this potential misinterpretation. As modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.
- *Guideline 3*: NERC compared the existing VSLs to the stated requirement language to ensure the VSLs do not redefine or undermine the reliability goal of the requirement. In accordance with Guideline 3, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.
- *Guideline 4*: The VSL assignments comply with Guideline 4, because they are based on a single violation of a Reliability Standard and are not based on a cumulative number of violations of the same requirement over a period of time.

VSLs for Requirements R9:

Standard, Requirement	Requirement Language	Lower	Moderate	High	Severe	Comments
EOP-006-2, R9	Each Reliability Coordinator shall include within its operations training program, annual System restoration training for its System Operators to assure the	N/A	N/A	The Reliability Coordinator included the annual System restoration training within its operations training program, but did not address both of	The Reliability Coordinator did not include the annual System restoration training within its operations training program.	Citing a Guideline 1 issue, FERC staff was concerned that a two-year timeline was not appropriate because the requirement talks about an annual plan.

	<p>proper execution of its restoration plan. This training program shall address the following:</p> <p>R9.1. The coordination role of the Reliability Coordinator.</p> <p>R9.2. Reestablishing the Interconnection.</p>			the sub-requirements.		<p>NERC staff agreed that the VSLs should be focused on the “annual” aspect, and modified them to better match the requirement language.</p>
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Original Guideline Explanation for R9 VSLs in [December 1, 2010 VSL Filing 2](#):

In accordance with Guidelines 2 and 3, the VSLs were modified from the previously filed version 2 of the standard for clarity and consistency with other standards and VSLs and the language in the requirement.

- *Guideline 1:* P. 881-882 of Guideline 1 Analysis in [March 5, 2012 VSL Filing 1](#)
- *Guideline 2:* NERC has reviewed the VSL text and has determined that, with the correction of typographical errors, stylistic edits or format changes, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.
- *Guideline 3:* The VSLs were modified to be consistent with FERC Guideline 3. As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.
- *Guideline 4:* The VSL assignments comply with Guideline 4, because they are based on a single violation of a Reliability Standard and are not based on a cumulative number of violations of the same requirement over a period of time.

