

**Compliance Questionnaire and**

**Reliability Standard Audit Worksheet**

**EOP-002-3.1— Capacity and Energy Emergencies**

**Registered Entity:***(Must be completed by the Compliance Enforcement Authority)*

**NCR Number:***(Must be completed by the Compliance Enforcement Authority)*

**Applicable Function(s):BA, RC, LSE**

**Auditors:**

**Disclaimer**

 NERC developed this Reliability Standard Audit Worksheet (RSAW) language in order to facilitate NERC’s and the Regional Entities’ assessment of a registered entity’s compliance with this Reliability Standard. The NERC RSAW language is written to specific versions of each NERC Reliability Standard. Entities using this RSAW should choose the version of the RSAW applicable to the Reliability Standard being assessed. While the information included in this RSAW provides some of the methodology that NERC has elected to use to assess compliance with the requirements of the Reliability Standard, this document should not be treated as a substitute for the Reliability Standard or viewed as additional Reliability Standard requirements. In all cases, the Regional Entity should rely on the language contained in the Reliability Standard itself, and not on the language contained in this RSAW, to determine compliance with the Reliability Standard. NERC’s Reliability Standards can be found on NERC’s website. Additionally, NERC Reliability Standards are updated frequently, and this RSAW may not necessarily be updated with the same frequency. Therefore, it is imperative that entities treat this RSAW as a reference document only, and not as a substitute or replacement for the Reliability Standard. It is the responsibility of the registered entity to verify its compliance with the latest approved version of the Reliability Standards, by the applicable governmental authority, relevant to its registration status.

The NERC RSAW language contained within this document provides a non‑exclusive list, for informational purposesonly, of examples of the types of evidence a registered entity may produce or may be asked to produce to demonstrate compliance with the Reliability Standard. A registered entity’s adherence to theexamples contained within this RSAW does not necessarily constitute compliance with the applicable Reliability Standard, and NERC and the Regional Entity using this RSAW reserves the right to request additional evidence from the registered entity that is not included in this RSAW. Additionally, this RSAW includes excerpts from FERC Orders and other regulatory references. The FERC Order cites are provided for ease of reference only, and this document does not necessarily include all applicable Order provisions. In the event of a discrepancy between FERC Orders, and the language included in this document, FERC Orders shall prevail.

# ­Subject Matter Experts

Identify your company’s subject matter expert(s) responsible for this Reliability Standard. Include the person's title, organization and the requirement(s) for which they are responsible. Insert additional lines if necessary.

**Response: *(Registered Entity Response Required)***

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| **SME Name** | **Title** | **Organization** | **Requirement** |
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# Reliability Standard Language

 **EOP-002-3.1— Capacity and Energy Emergencies**

**Purpose:**

To ensure Reliability Coordinators and Balancing Authorities are prepared for capacity and energy emergencies.

**Applicability:**

 Balancing Authorities

 Reliability Coordinators

 Load-Serving Entities

**NERC BOT Approval Date:**

**FERC Approval Date:**

**Reliability Standard Enforcement Date in the United States:**

**Requirements**:

**R1.** Each Balancing Authority and Reliability Coordinator shall have the responsibility and clear decision‑making authority to take whatever actions are needed to ensure the reliability of its respective area and shall exercise specific authority to alleviate capacity and energy emergencies.

**Describe, in narrative form, how you meet compliance with this requirement: *(Registered Entity Response Required)***

# R1 Supporting Evidence and Documentation

**Response: *(Registered Entity Response Required)***

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**This section must be completed by the Compliance Enforcement Authority**

**Compliance Assessment Approach Specific to EOP-002-3.1 R1**

 \_\_\_ Determine if the entity’s personnel understand they have the responsibility and clear

 decision‑making authority to take whatever actions are needed to ensure the reliability of its respective area.

 Note: If the operators do not understand this, it may not be a violation, but it signals a need for additional training. This part of the requirement gives operators the authority and responsibility.

 \_\_\_ Determine if the entity exercised its authority to alleviate capacity and energy emergencies (if the entity did not do this, this is a violation).

**Detailed notes:**

**Additional Evidence Reviewed:**

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**R2.** Each Balancing Authority shall, when required and as appropriate, take one or more actions as described in its capacity and energy emergency plan, to reduce risks to the interconnected system.

**Describe, in narrative form, how you meet compliance with this requirement: *(Registered Entity Response Required)***

**Question:** Have you taken one or more actions described in your Capacity and Energy Emergency planduring the audit period? If yes, explain what actions were taken and describe the operating conditions that required implementation of your plan.

 **EntityResponse: *(Registered Entity Response Required)***

# R2 Supporting Evidence and Documentation

**Response: *(Registered Entity Response Required)***

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**This section must be completed by the Compliance Enforcement Authority**

**Compliance Assessment Approach Specific to EOP-002-3.1 R2**

 \_\_\_Determine if the Balancing Authority took one or more actions as described in its capacity and energy emergency plans appropriately as required to reduce risks to the interconnected system.

**Detailed notes:**

**R3.** A Balancing Authority that is experiencing an operating capacity or energy emergency shall communicate its current and future system conditions to its Reliability Coordinator and neighboring Balancing Authorities.

**Describe, in narrative form, how you meet compliance with this requirement: *(Registered Entity Response Required)***

# R3 Supporting Evidence and Documentation

**Response: *(Registered Entity Response Required)***

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**This section must be completed by the Compliance Enforcement Authority**

**Compliance Assessment Approach Specific to EOP-002-3.1 R3**

 \_\_\_Determine if the Balancing Authority that experienced an operating capacity or energy emergency communicated its current and future system conditions to its Reliability Coordinator and neighboring Balancing Authorities.

**Detailed notes:**

**R4.** A Balancing Authority anticipating an operating capacity or energy emergency shall perform all actions necessary including bringing on all available generation, postponing equipment maintenance, scheduling interchange purchases in advance, and being prepared to reduce firm load.

**Describe, in narrative form, how you meet compliance with this requirement: *(Registered Entity Response Required)***

# R4 Supporting Evidence and Documentation

**Response: *(Registered Entity Response Required)***

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**This section must be completed by the Compliance Enforcement Authority**

**Compliance Assessment Approach Specific to EOP-002-3.1 R4**

 \_\_\_ Determine if a Balancing Authority that anticipated an operating capacity or energy emergency performed all actions necessary, which could include:

 \_\_\_Bringing on all available generation

 \_\_\_Postponing equipment maintenance

 \_\_\_Scheduling interchange purchases in advance

 \_\_\_Being prepared to reduce firm load

 \_\_\_Other‑ The list above is not all inclusive of evidence required to show compliance with the Reliability Standard. Provide additional information here to demonstrate compliance with this Reliability Standard.

 Note: The Reliability Standard states that the entity shall perform all actions necessary, including the above. Other actions may need to be taken if the above are not enough, or could be taken instead of the above. Note that the failure to take one or more of the above actions, or the failure to take additional actions, may or may not constitute a violation of this Requirement.

**Detailed notes:**

**R5.** A deficient Balancing Authority shall only use the assistance provided by the Interconnection’s frequency bias for the time needed to implement corrective actions. The Balancing Authority shall not unilaterally adjust generation in an attempt to return Interconnection frequency to normal beyond that supplied through frequency bias action and Interchange Schedule changes. Such unilateral adjustment may overload transmission facilities.

**Describe, in narrative form, how you meet compliance with this requirement: *(Registered Entity Response Required)***

# R5 Supporting Evidence and Documentation

**Response: *(Registered Entity Response Required)***

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**This section must be completed by the Compliance Enforcement Authority**

**Compliance Assessment Approach Specific to EOP-002-3.1 R5**

 \_\_\_Determine if a Balancing Authority that experienced a deficiency used the assistance provided by the Interconnection’s frequency bias only for the time needed to implement corrective actions.

 **\_\_\_** Determine if the Balancing Authority unilaterally adjusted generation in an attempt to return interconnection frequency to normal beyond that supplied through frequency bias action and Interchange Schedule changes.

 \_\_\_Other‑ The list above is not all inclusive of evidence required to show compliance with the Reliability Standard. Provide additional information here that demonstrates compliance with this Reliability Standard.

**Detailed notes:**

**R6.** If the Balancing Authority cannot comply with the Control Performance and Disturbance Control Standards, then it shall immediately implement remedies to do so. These remedies include, but are not limited to:

 **R6.1.**Loading all available generating capacity.

 **R6.2.**Deploying all available operating reserve.

 **R6.3.**Interrupting interruptible load and exports.

 **R6.4.**Requesting emergency assistance from other Balancing Authorities.

 **R6.5.**Declaring an Energy Emergency through its Reliability Coordinator; and

 **R6.6.**Reducing load, through procedures such as public appeals, voltage reductions, curtailing interruptible loads and firm loads.

**Describe, in narrative form, how you meet compliance with this requirement: *(Registered Entity Response Required)***

**Question:** As a Balancing Authority, if you have not met the CPS or the DCS requirements, please explain the steps you have taken to bring CPS or DCS into compliance?

  **EntityResponse: *(Registered Entity Response Required)***

# R6 Supporting Evidence and Documentation

**Response: *(Registered Entity Response Required)***

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**This section must be completed by the Compliance Enforcement Authority**

**Compliance Assessment Approach Specific to EOP-002-3.1 R6**

 \_\_\_Determine if the Balancing Authority could not comply with the Control performance and Disturbance Control Standards.

 If yes to the above:

 \_\_\_ Determine if it implemented remedies to allow it to do so, including, but not limited to:

\_\_\_ Loading all available generating capacity

 \_\_\_ Deploying all available operating reserve

 \_\_\_ Interrupting interruptible load and exports

 \_\_\_ Requesting emergency assistance from other Balancing Authorities

 \_\_\_ Declaring an Energy Emergency through its Reliability Coordinator

 \_\_\_ Reducing load, through procedures such as public appeals, voltage reductions, curtailing interruptible loads and firm loads

**Detailed notes:**

**R7.** Once the Balancing Authority has exhausted the steps listed in Requirement 6, or if these steps cannot be completed in sufficient time to resolve the emergency condition, the Balancing Authority shall:

 **R7.1.**Manually shed firm load without delay to return its ACE to zero; and

 **R7.2.**Request the Reliability Coordinator to declare an Energy Emergency Alert in accordancewith Attachment 1-EOP-002 “Energy Emergency Alerts.”

**Describe, in narrative form, how you meet compliance with this requirement: *(Registered Entity Response Required)***

# R7 Supporting Evidence and Documentation

**Response: *(Registered Entity Response Required)***

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**This section must be completed by the Compliance Enforcement Authority**

**Compliance Assessment Approach Specific to EOP-002-3.1 R7**

 \_\_\_ Determine if the Balancing Authority exhausted the steps listed in Requirement 6 or if those steps could not be completed in sufficient time to resolve the emergency conditions.

 If yes to the above:

 \_\_\_Determine if the Balancing Authority manually shed firm load without delay to return its

 ACE to zero.

\_\_\_Determine if the Balancing Authority requested the Reliability Coordinator to declare an Energy Emergency Alert in accordance with Attachment 1‑EOP‑002.

**Detailed notes:**

**R8.** A Reliability Coordinator that has any Balancing Authority within its Reliability Coordinator area experiencing a potential or actual Energy Emergency shall initiate an Energy Emergency Alert as detailed in Attachment 1-EOP-002 “Energy Emergency Alert.” The Reliability Coordinator shall act to mitigate the emergency condition, including a request for emergency assistance if required.

**Describe, in narrative form, how you meet compliance with this requirement: *(Registered Entity Response Required)***

**Question:** As a Reliability Coordinator, have you ever implemented energy emergency alerts? If yes, please list all alerts issued in the last 3 years (or since June 18, 2007), with the associated Balancing Authorities, and describe the actions taken.

  **EntityResponse: *(Registered Entity Response Required)***

# R8 Supporting Evidence and Documentation

**Response: *(Registered Entity Response Required)***

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**This section must be completed by the Compliance Enforcement Authority**

**Compliance Assessment Approach Specific to EOP-002-3.1 R8**

 **\_\_\_** Determine if the Reliability Coordinator had a Balancing Authority within its Reliability

 Coordinator area experiencing a potential or actual Energy Emergency.

 If yes to the above:

 \_\_\_Determine if the Reliability Coordinator initiated an Energy Emergency Alert as detailed in Attachment 1‑EOP‑002.

 \_\_\_Determine if the Reliability Coordinator acted to mitigate the emergency condition, including requesting emergency assistance as required.

**Note to Auditor:**

A CEA is to consider the following when assessing compliance in cases where a NERC software tool was unavailable:

 During the time that a NERC Software Tool is not available and a NERC Reliability Standard Requirement:

A. requires the use of a NERC Software Tool, and

B. other means of accomplishing the reliability objective of the requirements are available

Since both conditions above, A and B, apply a CEA is to verify that a registered entity used an alternate method or back-up tool for accomplishing the requirements. CEAs are to look for alternate methods that may include basic processes, such as email notifications or phone records that indicate the entity called the applicable party with the required information.

**Detailed notes:**

**R9.** When a Transmission Service Provider expects to elevate the transmission service priority of an Interchange Transaction from Priority 6 (Network Integration Transmission Service from Non-designated Resources) to Priority 7 (Network Integration Transmission Service from designated Network Resources) as permitted in its transmission tariff:

 **R9.1.**The deficient Load-Serving Entity shall request its Reliability Coordinator to initiate an Energy Emergency Alert in accordance with Attachment 1-EOP-002.

 **R9.2.**The Reliability Coordinator shall submit the report to NERC for posting on the NERC Website, noting the expected total MW that may have its transmission service priority changed.

 **R9.3.**The Reliability Coordinator shall use EEA 1 to forecast the change of the priority oftransmission service of an Interchange Transaction on the system from Priority 6 to Priority 7.

 **R9.4.**The Reliability Coordinator shall use EEA 2 to announce the change of the priority of transmission service of an Interchange Transaction on the system from Priority 6 to Priority 7.

**Describe, in narrative form, how you meet compliance with this requirement: *(Registered Entity Response Required)***

# R9 Supporting Evidence and Documentation

**Response: *(Registered Entity Response Required)***

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**This section must be completed by the Compliance Enforcement Authority**

**Compliance Assessment Approach Specific to EOP-002-3.1 R9**

 \_\_\_Determine if a Transmission Service Provider expected to elevate the transmission service priority of an Interchange Transaction from Priority 6 (Network Integration Transmission Service from Non‑designated Resources) to Priority 7 (Network Integration Transmission Service from designated Network Resources) as permitted in its transmission tariff.

 If yes to the above:

 \_\_\_Determine if the deficient Load‑Serving Entity requested its Reliability Coordinator to initiate an Energy Emergency Alert in accordance with Attachment 1‑EOP‑002.

 \_\_\_Determine if the Reliability Coordinator submitted a report to NERC for posting to the NERC website, noting the expected total MW that may have its transmission service priority changed.

\_\_\_Determine if the Reliability Coordinator used EEA 1 to forecast the change of the priority of transmission service of an Interchange Transaction on the system from Priority 6 to Priority 7.

\_\_\_Determine if the Reliability Coordinator used EEA 2 to announce the change of the priority of transmission service of an Interchange Transaction on the system from Priority 6 to Priority 7.

 Note: If the Registered Entity has not experienced an operating capacity or energy emergency event, then this should be taken into consideration when auditing this Reliability Standard.

**Detailed notes:**

# Supplemental Information

**Other ‑**The list of questions above is not all inclusive of evidence required to show compliance with the Reliability Standard. Provide additional information here**, as necessary that**demonstrates compliance with this Reliability Standard.

  **EntityResponse: *(Registered Entity Response)***

# Compliance Findings Summary(to be filled out by auditor)

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| **Req.** | **NF** | **PV** | **OEA** | **NA** | **Statement** |
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**Excerpts from FERC Orders -- For Reference Purposes Only**

**Updated Through April 15, 2013**

**EOP-002-3**

**Order No. 693**

P 541. The Emergency Preparedness and Operations (EOP) group of proposed Reliability Standards consists of nine Reliability Standards that address preparation for emergencies, necessary actions during emergencies and system restoration and reporting following disturbances.

P 567. EOP-002-2 applies to balancing authorities and reliability coordinators and is intended to ensure that they are prepared for capacity and energy emergencies.The Reliability Standard requires that balancing authorities have the authority to bring all necessary generation on line, communicate about the energy and capacity emergency with the reliability coordinator and coordinate with other balancing authorities. EOP- 002-2 includes an attachment that describes an emergency procedure to be initiated by a reliability coordinator that declares one of four energy emergency alert levels to provideassistance to the LSE.

 P571. As we stated in the NOPR, neither EOP-002-2 nor any other Reliability Standard addresses the impact of inadequate transmission during generation emergencies ….

 P 583. Accordingly, the Commission approves Reliability Standard EOP-002-2 asmandatory and enforceable. ….

**April 22, 2008 Order Conditionally Accepting Emergency Demand Response Filing, Docket No. ER08-404-000.**

P 94. **…**By definition, emergency alerts only apply during scarce periods when LSEs expect not to be able to meet customers’ energy needs because of a lack of resources or a lack of transmission available to move resources into deficient regions. Therefore, energy emergencies generally reflect localized energy and reserve shortages.

**North American Electric Reliability Corporation, Docket No. RD09-2-000, Letter Order (May 13, 2009)**

FERC approved revised versions of several Reliability Standards, including EOP-002-2.1.

**North American Electric Reliability Corporation, 134 FERC ¶ 61,015 (January 10, 2011)**

FERC approved modifications contained in Reliability Standard EOP-002-3 to address FERC directives set forth in Order No. 693.

**North American Electric Reliability Corporation,140 FERC ¶ 61,191 (September 13, 2012)**

On June 5, 2012, NERC submitted a filing that requested approval of errata changes to seven Reliability Standards including:

EOP-002-3 Capacity and Energy Emergencies - update the title of Attachment 1 and correct internalreferences thereto; remove parenthetical in Requirement R9 that references to a retired Attachment to another standard, IRO-006. As a result of these changes, this standard will be numbered “EOP-002-3.1” on a going-forward basis.NERC has also updated the version history table to reflect these revisions.

NERC’s uncontested filing is approved pursuant to the relevant authority delegated to the Director, Office of Electric Reliability, under 18 C.F.R. § 375.303, as of the date of this order [September 13, 2012].

**Revision History**

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| **Version** | **Date** | **Reviewers** | **Revision Description** |
| 1 | 5/5/10 | Craig Struck | Added Revision History. Minor formatting & typographical error changes. |
| 1 | Dec 2010 | QRSAW WG | Revised Findings Table, modified Supporting Evidence tables |
| 1 | January 2011 | Craig Struck | Reviewed for format consistency and content. |
| 1 | September 2011 | QRSAW WG | Modified to address Order No. 693 Directives contained in paragraph 582 |
| 1 | October 5, 2011 | NERC Legal | Updated excerpts from FERC orders from March 31, 2009 through and including October 5, 2011. |
| 1.1 | February 1, 2013 | Jacki Power | Revised to align RSAW with errata changes to the Reliability Standard. Errata change include: Changed references to Attachment 1 throughout Standard from “Attachment 1-EOP-002-0 Energy Emergency Alert Levels” to “Attachment 1-EOP-002 Energy Emergency Alerts”. Removed parenthetical in Requirement R9 referencing a retired Attachment in IRO-006) |
| 1.1 | April 15, 2013 | NERC Legal | Updated excerpts from FERC orders from October 5, 2011 through and including April 15, 2013. |
| 1.2 | March 20, 2014 | RSAW Task Force | Updated to include compliance guidance contained in CAN-0015. |