



September 9, 2011

**VIA ELECTRONIC FILING**

Ms. Kimberly D. Bose  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, D.C. 20426

**Re: *North American Electric Reliability Corporation,*  
Docket No. *RM11-\_\_\_ - \_\_\_***

Dear Ms. Bose:

The North American Electric Reliability Corporation (“NERC”) hereby submits this petition in accordance with Section 215(d)(1) of the Federal Power Act (“FPA”) and Part 39.5 of the Federal Energy Regulatory Commission’s (“FERC” or “the Commission”) regulations seeking approval of EOP-001-0b and EOP-001-2b — Emergency Operations Planning, which has appended to it an interpretation of Requirements R1 and R3.2 to FERC-approved NERC Reliability Standards EOP-001-0 and Requirements R1 and R2.2 to EOP-001-2 — Emergency Operations Planning, as set forth in **Exhibit B** and **Exhibit C** to this petition.

Specifically, this petition is seeking approval of:

- an interpretation to Requirement R1 of EOP-001-0 — Emergency Operations Planning as set forth in **Exhibit A** to the petition to become effective concurrent with the date of a FERC Order approving this petition;

- an interpretation to Requirement R3.2 of EOP-001-0 Emergency Operations Planning also set forth in **Exhibit A** to this petition to become effective concurrent with the date of a FERC Order approving this petition;
- Reliability Standard EOP-001-0b — Emergency Operations Planning, that includes the appended interpretation of Requirement R1 and R3.2 as set forth in **Exhibit B** to the petition to become effective concurrent with the date of a FERC Order approving this petition;
- Retirement of Reliability Standard EOP-001-0b — Emergency Operations Planning effective as of midnight on June 30, 2013; and
- Reliability Standard EOP-001-2b — Emergency Operations Planning, that includes the appended interpretations to Requirement R1 and R2.2 as set forth in **Exhibit C** to the petition to become effective on July 1, 2013, consistent with FERC’s approval date of the EOP-001-2 Reliability Standard approved in FERC Order Nos. 748 and 749.<sup>1</sup>

These interpretations were approved by the NERC Board of Trustees on November 4, 2010.

NERC’s petition consists of the following:

- This transmittal letter;
- A table of contents for the filing;
- A narrative description explaining the interpretations and how they meet the reliability goal of the standard;

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<sup>1</sup> *Mandatory Reliability Standards for Interconnection Reliability Operating Limits*, 134 FERC ¶ 61,213, Order No. 748 (2011); *System Restoration Reliability Standards*, 134 FERC ¶ 61,215, Order No. 749 (2011); *Mandatory Reliability Standards for Interconnection Reliability Operating Limits; System Restoration Reliability Standards*, 136 FERC ¶ 61,030, Order Nos. 748-A and 749-A (2011).

- Interpretations of Requirements R1 and R3.2 of EOP-001-0 — Emergency Operations Planning (**Exhibit A**);
- Proposed Reliability Standard EOP-001-0b — Emergency Operations Planning, that includes the appended interpretations of Requirements R1 and R3.2 of EOP-001-0 — Emergency Operations Planning, submitted for approval (**Exhibit B**);
- Reliability Standard EOP-001-2b — Emergency Operations Planning, that includes the appended interpretations of Requirement R1 and R2.2 (**Exhibit C**);
- Consideration of Comments for interpretations to Requirements R1 of EOP-001-0 — Emergency Operations Planning (**Exhibit D**);
- Consideration of Comments for interpretations to Requirements R3.2 of EOP-001-0 — Emergency Operations Planning (**Exhibit E**);
- The complete development record of the interpretation Requirement R1 of EOP-001-0 — Emergency Operations Planning (**Exhibit F**);
- The complete development record of the interpretation Requirement R3.2 of EOP-001-0 — Emergency Operations Planning (**Exhibit G**); and
- A roster of the interpretation drafting team for the interpretations of Requirements R1 EOP-001-0 — Emergency Operations Planning (**Exhibit H**);
- A roster of the interpretation drafting team for the interpretations of Requirements R3.2 EOP-001-0 — Emergency Operations Planning (**Exhibit I**).

Please contact the undersigned if you have any questions.

Respectfully submitted,

/s/ Andrew M. Dressel

Andrew M. Dressel

Attorney for North American Electric  
Reliability Corporation

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**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

**NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION ) Docket No. RM11-\_\_-000  
CORPORATION )**

**PETITION OF THE  
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION FOR  
APPROVAL OF INTERPRETATIONS TO REQUIREMENTS  
OF RELIABILITY STANDARDS  
EOP-001-0 and EOP-001-2— EMERGENCY OPERATIONS PLANNING**

Gerald W. Cauley  
President and Chief Executive Officer  
3353 Peachtree Road N.E.  
Suite 600, North Tower  
Atlanta, GA 30326-1001  
David N. Cook  
Senior Vice President and General Counsel  
North American Electric Reliability  
Corporation  
1120 G Street N.W., Suite 990  
Washington, D.C. 20005-3801  
david.cook@nerc.net

Holly A. Hawkins  
Assistant General Counsel for  
Standards and Critical Infrastructure  
Protection  
Andrew M. Dressel  
Attorney  
North American Electric Reliability  
Corporation  
1120 G Street, N.W.  
Suite 990  
Washington, D.C. 20005-3801  
(202) 393-3998  
(202) 393-3955 – facsimile  
holly.hawkins@nerc.net  
andrew.dressel@nerc.net

September 9, 2011

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**Exhibit A** — Interpretations of Requirements R1 and R3.2 of EOP-001-0 — Emergency Operations Planning.

**Exhibit B** — Proposed Reliability Standard EOP-001-0b — Emergency Operations Planning, that includes the appended interpretations of Requirements R1 and R3.2 of EOP-001-0 — Emergency Operations Planning, submitted for approval.

**Exhibit C** — Proposed Reliability Standard EOP-001-2b — Emergency Operations Planning, that includes the appended interpretations of Requirements R1 and R2.2 of EOP-001-2 — Emergency Operations Planning, submitted for approval.

**Exhibit D** — Consideration of Comments for interpretations to Requirements R1 of EOP-001-0 — Emergency Operations Planning

**Exhibit E** — Consideration of Comments for interpretations to Requirements R3.2 of EOP-001-0 — Emergency Operations Planning

**Exhibit F** — Complete Record of Development of the Interpretation of Requirement R1 of EOP-001-0 — Emergency Operations Planning.

**Exhibit G** — Complete Record of Development of the Interpretation of Requirement R3.2 of EOP-001-0 — Emergency Operations Planning.

**Exhibit H** — Roster of the Interpretation Drafting Team for the Interpretation of Requirement R1 of EOP-001-0 — Emergency Operations Planning.

**Exhibit I** — Roster of the Interpretation Drafting Team for the Interpretation of Requirement R3.2 of EOP-001-0 — Emergency Operations Planning.

## I. INTRODUCTION

The North American Electric Reliability Corporation (“NERC”)<sup>2</sup> hereby requests the Federal Energy Regulatory Commission (“FERC” or “Commission”) to approve, in accordance with Section 215(d)(1) of the Federal Power Act (“FPA”)<sup>3</sup> and Section 39.5 of FERC’s Regulations,<sup>4</sup> Reliability Standard EOP-001-0b<sup>5</sup> — Emergency Operations Planning (EOP-001-0b), to become effective concurrent with the date of a FERC Order approving this petition, and Reliability Standard EOP-001-2b,<sup>6</sup> to become effective on July 1, 2013, consistent with the effective date of the EOP-001-2 Reliability Standard approved in FERC Order Nos. 748 and 749.<sup>7</sup>

Specifically, this petition is seeking approval of:

- an interpretation to Requirement R1 of EOP-001-0 — Emergency Operations Planning (EOP-001-0) as set forth in **Exhibit A** to this petition to become effective concurrent with the date of a FERC Order approving this petition;

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<sup>2</sup> NERC was certified by FERC as the electric reliability organization (“ERO”) authorized by Section 215 of the Federal Power Act. FERC certified NERC as the ERO in its order issued July 20, 2006 in Docket No. RR06-1-000 *Order Certifying North American Electric Reliability Corporation as the Electric Reliability Organization and Ordering Compliance Filing*, 116 FERC ¶ 61,062 (2006) (“ERO Certification Order”).

<sup>3</sup> 16 U.S.C. 824o (2006).

<sup>4</sup> 18 C.F.R. § 39.5 (2011).

<sup>5</sup> NERC is requesting that the proposed standard with both interpretations appended (for R1 and R3.2 respectively) be labeled as EOP-001-0b. If only one of the two interpretations are approved the proposed standard with one interpretation appended shall be designated EOP-001-0a.

<sup>6</sup> As in Footnote 5, NERC is requesting that the proposed standard with both interpretations appended (for R1 and R2.2 respectively) be labeled as EOP-001-2b. If only one of the two interpretations are approved the proposed standard with one interpretation appended shall be designated EOP-001-2a.

<sup>7</sup> *Mandatory Reliability Standards for Interconnection Reliability Operating Limits*, 134 FERC ¶ 61,213, Order No. 748 (2011); *System Restoration Reliability Standards*, 134 FERC ¶ 61,215, Order No. 749 (2011); *Mandatory Reliability Standards for Interconnection Reliability Operating Limits; System Restoration Reliability Standards*, 136 FERC ¶ 61,030, Order Nos. 748-A and 749-A (2011).

- an interpretation to Requirement R3.2 of EOP-001-0 — Emergency Operations Planning (EOP-001-0)<sup>8</sup> also set forth in **Exhibit A** to this petition to become effective ;
- Reliability Standard EOP-001-0b — Emergency Operations Planning, that includes the appended interpretation s of Requirements R1 and R3.2 as set forth in **Exhibit B** to this petition, to become effective concurrent with the date of a FERC Order approving this petition;
- Retirement of Reliability Standard EOP-001-0— Emergency Operations Planning with EOP-001-0b effective as of midnight on June 30, 2013;
- Reliability Standard EOP-001-2b — Emergency Operations Planning, , that includes the appended interpretation s of Requirements R1 and R2.2 as set forth in **Exhibit C** to this petition, to become effective July 1, 2013, consistent with FERC’s approval date of the EOP-001-2 Reliability Standard approved in FERC Order Nos. 748 and 749.<sup>9</sup>

Upon Commission approval, NERC will refer to the Reliability Standards affected by this interpretation as:

- EOP-001-0b — Emergency Operations Planning (EOP-001-0b)
- EOP-001-2b — Emergency Operations Planning (EOP-001-2b)

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<sup>8</sup> Requirement R3.2 in EOP-001-0 is the same requirement as Requirement R2.2 in EOP-001-2. EOP-001-2 has been approved by FERC but will not be effective until July 1, 2013. However, because EOP-001-0 is the currently-effective and enforceable Reliability Standard and EOP-001-2 is not yet effective, NERC chose to refer to R3.2 in EOP-001-0 throughout the body of this filing. NERC requests FERC consider these alternate references as equivalent as they are referring to the same requirement.

<sup>9</sup> *Mandatory Reliability Standards for Interconnection Reliability Operating Limits*, 134 FERC ¶ 61,213, Order No. 748 (2011); *System Restoration Reliability Standards*, 134 FERC ¶ 61,215, Order No. 749 (2011); *Mandatory Reliability Standards for Interconnection Reliability Operating Limits; System Restoration Reliability Standards*, 136 FERC ¶ 61,030, Order Nos. 748-A and 749-A (2011).



NERC's interpretation process does not allow for modification to the language contained in a Reliability Standard nor its requirements through a request for an interpretation. A valid interpretation request is one that requests additional clarity about one or more requirements in a regulatory-approved Reliability Standard and does not request verification as to whether or not a specific approach will be judged as complying with one or more requirements in a regulatory-approved Reliability Standard. A valid interpretation in response to a request for interpretation provides additional clarity about one or more requirements within a Reliability Standard, but does not expand or limit the Reliability Standard or any of its requirements beyond the language contained in the standard.

The original request for the interpretation for Requirement R1 was written to seek clarity regarding Requirement R1 of EOP-001-0 and Requirement R2.2 of EOP-001-1. However, because EOP-001-1 will not become a mandatory and effective Reliability Standard, and EOP-001-2 — Emergency Operations Planning (EOP-001-2) will not be effective until July 1, 2013,<sup>10</sup> NERC is seeking approval of the interpretations to be appended to currently effective EOP-001-0 standard until June 30, 2013, at which time the interpretations will be appended to the EOP-001-2 Reliability Standard upon its implementation date of July 1, 2013. The NERC Board of Trustees approved both of the interpretations to EOP-001 on November 4, 2010.

**Exhibit A** to this petition sets forth the interpretations of Requirements R1 and R3.2 to EOP-001-0. **Exhibit B** to this petition contains proposed Reliability Standard

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<sup>10</sup> *Mandatory Reliability Standards for Interconnection Reliability Operating Limits*, 134 FERC ¶ 61,213, Order No. 748 (2011); *System Restoration Reliability Standards*, 134 FERC ¶ 61,215, Order No. 749 (2011); *Mandatory Reliability Standards for Interconnection Reliability Operating Limits; System Restoration Reliability Standards*, 136 FERC ¶ 61,030, Order Nos. 748-A and 749-A (2011).

EOP-001-0b — Emergency Operations Planning, which includes the appended interpretations of Requirements R1 and R3.2. **Exhibit C** to this petition contains proposed Reliability Standard EOP-001-2b — Emergency Operations Planning, which includes the appended interpretations of Requirements R1 and R2.2. **Exhibit D** to this petition contains the drafting team’s consideration of industry comments for the interpretations to Requirements R1. **Exhibit E** to this petition contains the drafting team’s consideration of industry comments for the interpretations to Requirements R3.2. **Exhibit F** contains the complete development history of the Interpretation of Requirement R1 of EOP-001-0. **Exhibit G** to this petition contains the complete development history of the Interpretation of Requirement R3.2 of EOP-001-0— Emergency Operations Planning. **Exhibit H** to this petition contains the roster of the interpretation drafting team that drafted the interpretation of Requirement R1. **Exhibit I** to this petition contains the roster of the interpretation drafting team that drafted the interpretation of Requirement R3.2.

NERC is also filing this interpretation with applicable governmental authorities in Canada.

## **II. NOTICES AND COMMUNICATIONS**

Notices and communications with respect to this filing may be addressed to the following:

Gerald W. Cauley  
President and Chief Executive Officer  
3353 Peachtree Road N.E.  
Suite 600, North Tower  
Atlanta, GA 30326-1001  
David N. Cook\*  
Senior Vice President and General Counsel  
North American Electric Reliability  
Corporation  
1120 G Street N.W., Suite 990  
Washington, D.C. 20005-3801  
david.cook@nerc.net

Holly A. Hawkins\*  
Assistant General Counsel for Standards  
and Critical Infrastructure  
Andrew M. Dressel\*  
Attorney  
North American Electric Reliability  
Corporation  
1120 G Street, N.W.  
Suite 990  
Washington, D.C. 20005-3801  
(202) 393-3998  
(202) 393-3955 – facsimile  
holly.hawkins@nerc.net  
andrew.dressel@nerc.net

\*Persons to be included on FERC’s service list are indicated with an asterisk. NERC requests waiver of FERC’s rules and regulations to permit the inclusion of more than two people on the service list.

### **III. BACKGROUND**

#### **a. Regulatory Framework**

By enacting the Energy Policy Act of 2005,<sup>11</sup> Congress entrusted FERC with the duties of approving and enforcing rules to ensure the reliability of the Nation’s bulk power system, and with the duties of certifying an electric reliability organization (“ERO”) that would be charged with developing and enforcing mandatory Reliability Standards, subject to FERC approval. Section 215 states that all users, owners and operators of the bulk power system in the United States will be subject to FERC-approved Reliability Standards.

#### **b. Basis for Approval of Proposed Reliability Standard**

The proposed Reliability Standard contains interpretations of two requirements within a Commission-approved Reliability Standard but does not represent a new or

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<sup>11</sup> Energy Policy Act of 2005, Pub. L. No. 109-58, Title XII, Subtitle A, 119 Stat. 594, 941 (2005) (codified at 16 U.S.C. § 824o).

modified Reliability Standard. The proposed Reliability Standard provides additional clarity with regard to the intent of the Reliability Standard. Therefore, NERC requests that the Commission approve the proposed interpretations.

### **c. Reliability Standards Development Procedure and Interpretation**

All persons who are directly or materially affected by the reliability of the North American bulk power system are permitted to request an interpretation of a Reliability Standard, as discussed in NERC's *Standard Processes Manual*,<sup>12</sup> which is incorporated into the NERC Rules of Procedure as Appendix 3A.

The process for responding to a valid request for interpretation requires NERC to assemble a team with the relevant expertise to address the interpretation request. The interpretation drafting team is then required to draft a response to the request for interpretation and then present that response for industry ballot. If approved by the ballot pool and the NERC Board of Trustees, the interpretation is appended to the Reliability Standard and filed for approval by FERC and applicable governmental authorities in Canada. Then, when the affected Reliability Standard undergoes its next substantive revision, the interpretation will be incorporated into the Reliability Standard, as appropriate.

The Operating Reliability Subcommittee Executive Committee ("ORS EC") was appointed as the interpretation drafting team to draft the response to the request for

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<sup>12</sup> Note that FERC approved the new *Standard Processes Manual* in the Commission's *Order Approving Petition and Directing Compliance Filing*, (132 FERC ¶ 61,200 (2010)), which replaced the NERC's *Reliability Standards Development Procedure Version 7* in its entirety. NERC developed these interpretations in accordance with the *Reliability Standards Development Procedure Version 7* until the *Standard Processes Manual* was approved on September 3, 2010. NERC's *Reliability Standards Development Procedure* is available on NERC's website at: [http://www.nerc.com/fileUploads/File/Standards/RSDP\\_V6\\_1\\_12Mar07.pdf](http://www.nerc.com/fileUploads/File/Standards/RSDP_V6_1_12Mar07.pdf). The *Standard Processes Manual* is available at: [http://www.nerc.com/files/Appendix\\_3A\\_Standard\\_Processes\\_Manual\\_20100903.pdf](http://www.nerc.com/files/Appendix_3A_Standard_Processes_Manual_20100903.pdf).

interpretation of Requirement R1 of EOP-001-0. The interpretation to Requirement R1 is included as **Exhibit A** to this petition. The roster for the interpretation drafting team for EOP-001-0 Requirement R1 is contained in **Exhibit H**. The proposed interpretation included as **Exhibit A** to this petition was approved by the ballot pool on October 14, 2010 with a weighted segment approval of 99.14%. The proposed interpretation was approved by the NERC Board of Trustees on November 4, 2010.

A separate interpretation drafting team was appointed to draft the response to the request for interpretation of Requirement R3.2 of EOP-001-0. The roster for this interpretation drafting team is contained in **Exhibit I**. The interpretation drafted by the interpretation drafting team is also included in **Exhibit A** to this petition. The interpretation to Requirement R3.2 was approved by industry stakeholders with a 94.78% weighted-segment vote on October 15, 2010. The interpretation was approved by the NERC Board of Trustees on November 4, 2010.

The interpretation drafting team's considerations of comments for the interpretation of Requirement R1 is contained in **Exhibit D**. The interpretation drafting team's considerations of comments for the interpretation of Requirement R3.2 is contained in **Exhibit E**. The complete development record for the interpretations, including the requests for the interpretation, the responses to the requests for the interpretation, the ballot pool, and the final ballot results by registered ballot body members, stakeholder comments received during the balloting and an explanation of how those comments were considered are set forth in **Exhibits F** (Requirement R1) and **G** (Requirement R3.2). **Exhibit H** (Requirement R1) and **I** (Requirement R3.2) contain the rosters of the team members who developed the proposed interpretations.

#### **IV. Proposed Reliability Standard EOP-001-0b and EOP-001-2b — Emergency Operations Planning**

In Section IV(a), below, NERC summarizes the justification for the proposed interpretations of Requirements R1 and R3.2 of EOP-001-0 and EOP-001-2b — Emergency Operations Planning and explains the development of the interpretations. Section IV(b), below, describes the development proceedings for these interpretations. Section IV(b) includes the stakeholder ballot results and provides an explanation of how stakeholder comments were considered and addressed by the interpretation drafting teams assembled to develop the interpretations.

##### **a. Justification for Approval of Interpretations**

##### **1. Requirement R1**

On April 2, 2008 the Regional Entity Compliance Managers (“RECM”)<sup>13</sup> requested an interpretation of Requirement R1 of EOP-001-0. Requirement R1 of EOP-001-0 states:

- R1.** Balancing Authorities shall have operating agreements with adjacent Balancing Authorities that shall, at a minimum, contain provisions for emergency assistance, including provisions to obtain emergency assistance from remote Balancing Authorities.

Specifically, the RECM sought clarification with respect to the following language in EOP-001-0, Requirement 1:

1. What is the definition of emergency assistance in the context of this standard?

What scope and time horizons, if any, are considered necessary in this definition?

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<sup>13</sup> The RECM requesting this interpretation consisted of representatives from the Florida Reliability Coordinating Council, Northeast Power Coordinating Council, Midwest Reliability Organization, ReliabilityFirst Corporation, SERC Reliability Corporation, Southwest Power Pool Regional Entity, Texas Regional Entity, and Western Electricity Coordinating Council.

2. What was intended by using the adjective “adjacent” in Requirement 1? Does “adjacent” Balancing Authorities mean “All” or something else? Is there qualifying criteria to determine if a very small adjacent Balancing Authority area has enough capacity to offer emergency assistance?
3. What is the definition of the word “remote” as stated in the last phrase of Requirement 1? Does remote mean every Balancing Authority who’s area does not physically touch the Balancing Authority attempting to comply with this Requirement?
4. Would a Balancing Authority that participates in a Reserve Sharing Group Agreement, which meets the requirements of Reliability Standard BAL-002-0, Requirement 2, be required to establish additional operating agreements to achieve compliance with Reliability Standard EOP-001-0, Requirement 1?

The interpretation drafting team was provided the following guidelines for developing a response to the RECM’s request for interpretation:

With a clear understanding of the standard’s purpose and the technical engineering approach that best serves reliability, the team must judge whether the standard as written can be interpreted consistent with these interests using the following principles:

- a. The interpretation cannot change the requirement or standard. That is, the interpretation cannot expand the scope of the requirement beyond the language in the requirement.
- b. The interpretation must address the question posed or the team must explain why it cannot address the question.
- c. The interpretation drafting team has full latitude to respond to a question using requirements in other reliability standards that were not identified specifically in the request if that information addresses the issue.

- d. The interpretation itself must add clarity and not be ambiguous or subject to interpretation.
- e. The interpretation should address the intent of the requirement and be in the best interest of reliability.

The interpretation of the requirement, which if implemented by the applicable entities, will provide for a reliable bulk power system, in a manner consistent with good utility practice and the public interest. These principles and application guideline intend that the interpretation will not lower the current level of compliance to the requirement by the applicable entities.<sup>14</sup>

In response to the RECM interpretation request, the interpretation drafting team developed, and the industry stakeholders approved, the following interpretation:

1. *What is the definition of emergency assistance in the context of this standard?*

*What scope and time horizons, if any, are considered necessary in this definition?*

**Response:**

In the context of this standard, emergency assistance is emergency energy. Emergency energy would normally be arranged for during the current operating day. The agreement should describe the conditions under which the emergency energy will be delivered to the responsible Balancing Authority.

2. *What was intended by using the adjective “adjacent” in Requirement 1? Does*

*“adjacent” Balancing Authorities mean “All” or something else? Is there qualifying criteria to determine if a very small adjacent Balancing Authority area has enough capacity to offer emergency assistance?*

**Response:**

The intent is that all Balancing Authorities, interconnected by AC ties or DC (asynchronous) ties within the same Interconnection, have emergency energy assistance agreements with at least one Adjacent Balancing Authority and have sufficient emergency energy assistance agreements to mitigate reasonably anticipated energy emergencies. However, the standard does not require emergency energy assistance agreements with all Adjacent Balancing Authorities, nor does it preclude having an emergency assistance agreement across Interconnections.

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<sup>14</sup> These were the guidelines for drafting interpretations in force at the time the interpretation proposed for approval was developed.



3. *What is the definition of the word “remote” as stated in the last phrase of Requirement 1? Does remote mean every Balancing Authority who’s area does not physically touch the Balancing Authority attempting to comply with this Requirement?*

**Response:**

A remote Balancing Authority is a Balancing Authority other than an Adjacent Balancing Authority. A Balancing Authority is not required to have arrangements in place to obtain emergency energy assistance with any remote Balancing Authorities. A Balancing Authority’s agreement(s) with Adjacent Balancing Authorities does (do) not preclude the Adjacent Balancing Authority from purchasing emergency energy from remote Balancing Authorities.

4. Would a Balancing Authority that participates in a Reserve Sharing Group Agreement, which meets the requirements of Reliability Standard BAL-002-0, Requirement 2, be required to establish additional operating agreements to achieve compliance with Reliability Standard EOP-001-0, Requirement 1?

**Response:**

A Reserve Sharing Group agreement that contains provisions for emergency assistance may be used to meet Requirement R1 of EOP-001-0.

The interpretation to Requirement R1 of EOP-001-0 is consistent with the stated purpose of the Reliability Standard, that each Transmission Operator and Balancing Authority needs to develop, maintain, and implement a set of plans to mitigate operating emergencies and that such plans need to be coordinated with other Transmission Operators and Balancing Authorities, and the Reliability Coordinator.

## 2. Requirement R3.2

The Florida Municipal Power Pool (“FMPP”) requested an interpretation of Requirement R3.2<sup>15</sup> of EOP-001-0 on October 15, 2009. Requirement R3.2 of EOP-001-0 states:

**R3.2.** [Each Transmission Operator and Balancing Authority shall:] develop, maintain, and implement a set of plans to mitigate operating emergencies on the transmission system.

FMPP requested clarity with respect to the emergency plans the Balancing Authority must have and asked the following regarding Requirement R3.2:

*Does the Balancing Authority need to develop a plan to maintain a load-interchange-generation balance during operating emergencies and follow the directives of the Transmission Operator?*

In response to FMPPs request for an interpretation of Requirement R3.2 of EOP-001-0, the interpretation drafting team developed, and the industry stakeholders and NERC Board of Trustees later approved, the following interpretation:

The answer to both parts of the question is yes. The Balancing Authority is required by the standard to develop, maintain, and implement a plan. The plan must consider the relationships and coordination with the Transmission Operator for actions directly taken by the Balancing Authority. The Balancing Authority must take actions either as directed by the Transmission Operator or the Reliability Coordinator (reference TOP-001-1, Requirement R3), or as previously agreed to with the Transmission Operator or the Reliability Coordinator to mitigate transmission emergencies. As stated in Requirement R5, the emergency plan shall include the applicable elements in “Attachment 1 – EOP-001-0.”

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<sup>15</sup> FMPP requested an interpretation of Requirement R2.2 of EOP-001-1 and EOP-001-2 but the currently-effective standard is EOP-001-0 and the equivalent requirement is Requirement R3.2 of EOP-001-0. As stated above, EOP-001-1 shall not become an effective Reliability Standard; *i.e.*, EOP-001-0 will be replaced by EOP-001-2.

## **b. Summary of the Reliability Standard Development Proceedings**

### **1. Requirement R1**

NERC presented the interpretation of Requirement R1 for a first initial ballot from June 19, 2008, through July 2, 2008 in which 162 ballots were returned with an affirmative vote, a negative vote or an abstention. The result of the first initial ballot achieved an affirmative weighted segment approval of 85.7 percent. Of the 162 ballots, 14 affirmative votes were cast with a comment and 15 negative votes were cast with a comment. Because there were negative votes cast which included comments, the results from the first initial ballot were not final.

In summary, several comments received following the first initial ballot requested additional clarification of certain terms used in the interpretation such as dc voltages, the definition of “adjacent” regarding Balancing Authorities, and how much was “enough” emergency energy assistance. A few entities suggested increased requirements for emergency energy assistance and Reserve Sharing Group participation.

In response to the comments received during the first initial ballot, the interpretation drafting team modified the language in the interpretation to use the term “Adjacent Balancing Authority,” a defined term in the NERC Glossary of Terms Used in Reliability Standards, and clarified that Requirement R1 does not compel energy assistance agreements with all Adjacent Balancing Authorities. The standard process in place at the time of development of the interpretation did not allow any modifications to the interpretation between the initial and recirculation ballots without posting the revised interpretation for a new initial ballot. Accordingly, the drafting team determined that,

although the interpretation received sufficient affirmative votes to pass, the improved clarity desired by the stakeholders warranted another pre-ballot review and initial ballot.

The revised interpretation was posted for a second initial ballot from February 27, 2009, through March 9, 2009 in which 165 ballots were returned. The second initial ballot received an affirmative weighted segment approval of 89.03 percent. Of the 165 votes cast, 6 affirmative votes were cast with a comment and 11 negative votes were cast with a comment.

In response to the comments received during the second initial ballot, the interpretation drafting team 1) modified the language in paragraph 2 of the interpretation to insert the phrase “interconnected by AC ties or DC (asynchronous) ties within the same Interconnection;” 2) modified the language in the second sentence of paragraph 3 by changing the word “all” to “any;” and 3) modified paragraph 4 of the interpretation to “A Reserve Sharing Group agreement that contains provisions for emergency assistance may be used to meet Requirement R1 of EOP-001-0.”

Following the comments received during the second initial ballot, the drafting team made additional substantive changes which required a third initial ballot. The third ballot ran from November 5, 2009, through November 16, 2009 and 190 stakeholder ballots were returned. The third initial ballot achieved an affirmative weighted segment approval of 98.07%. Of the 190 votes cast, eight affirmative votes were cast with a comment and three negative votes were cast with a comment. These comments included concerns that the wording in the response to question 2 appeared to limit the Balancing Authority to agreements with Balancing Authorities within the same Interconnection, which may be interpreted to nullify the use of existing agreements that cross

Interconnections as sufficient to meet this requirement. In response to these comments the interpretation drafting team revised paragraph 2 of the interpretation to state,

“The intent is that all Balancing Authorities, interconnected by AC ties or DC (asynchronous) ties within the same Interconnection, have emergency energy assistance agreements with at least one Adjacent Balancing Authority and have sufficient emergency energy assistance agreements to mitigate reasonably anticipated energy emergencies. However, the standard does not require emergency energy assistance agreements with all Adjacent Balancing Authorities, nor does it preclude having an emergency assistance agreement across Interconnections.”

Due to the fact that the interpretation drafting team again made substantive changes to the interpretation, the revised interpretation was posted for a fourth initial ballot from April 15, 2010, through April 26, 2010. Two hundred votes were cast in the fourth initial ballot. The result of the fourth initial ballot achieved an affirmative weighted segment approval of 98.64 percent. Of the 200 ballots returned, two affirmative votes were cast with a comment and two negative votes were cast with a comment.

Because there were negative votes cast which included comments, the results from the fourth initial ballot were not final and a final recirculation ballot was conducted. The recirculation ballot for the interpretation was held from October 4, 2010, through October 14, 2010. The result of the final recirculation ballot achieved an affirmative weighted segment approval of 99.14 percent. The NERC Board of Trustees approved the interpretation on November 4, 2010.

## **2. Requirement R3.2**

NERC presented the interpretation to Requirement R3.2<sup>16</sup> for pre-ballot review on January 11, 2010. The initial ballot ran from February 10, 2010 through February 22, 2010, achieving a quorum of 87.36 percent with a weighted affirmative approval of 91.79

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<sup>16</sup> As noted in Footnote 8, Requirement R3.2 in EOP-001-0 is the same requirement as Requirement R2.2 in EOP-001-2.

percent. Because NERC received some negative votes with comments, the results from the initial ballot could not be used to approve the interpretation. There were three comments received in total – one associated with an affirmative vote and two associated with negative votes.

Balloters who submitted negative votes with comments expressed concern about a possible expansion of the scope of the standard as a result of the interpretation. The balloters pointed out that the interpretation implied that the standard required Balancing Authorities to have “agreements” and implied that the Balancing Authority is required to follow Transmission Operator directives, but does not specifically require either of these actions. The drafting team responded as follows:

The drafting team recognizes it went outside the bounds of EOP-001-1 and EOP-001-2 in the effort to provide additional clarification in the interpretation. Accordingly, the drafting team replaced the word “agreements” in the third sentence with “coordination.”<sup>17</sup>

Because the changes resulting from the comments were minor in nature,<sup>18</sup> a recirculation ballot was held rather than a full re-posting of the ballot. The recirculation ballot was posted from October 5, 2010 through October 15, 2010 and achieved a quorum of 92.19 percent and approval of 94.78 percent. The NERC Board of Trustees approved the interpretation on November 4, 2010.

### **c. Future Action**

The EOP-001-2 Reliability Standard was approved by the Commission in Order Nos. 748 and 749, issued March 17, 2011. Upon Commission approval of the requested

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<sup>17</sup> *Consideration of Comments*, attached as Exhibit D.

<sup>18</sup> In the current FERC-approved NERC *Standard Processes Manual* interpretation drafting teams are allowed to make non-substantive changes to an interpretation between an initial ballot and a recirculation ballot. Previously, under the *Reliability Standards Development Procedure Version 7*, interpretation drafting teams were not allowed to make any changes to an interpretation between ballots.

interpretations, the interpretations shall remain in effect until such time as the interpretation can be incorporated into a future revision of the standard.

NERC's *Reliability Standards Development Plan:2011-2013* contains Project 2009-03 Emergency Operations. This project will address the following standards:

- EOP-001-0 — Emergency Operations Planning
- EOP-002-2 — Capacity and Energy Emergencies
- EOP-003-1 — Load Shedding Plans

This project is not currently active but is in the project prioritization category of “Additional Projects to be Initiated in Order of Priority.” That is, as existing high priority or nearly completed projects move to the final balloting stage and receive Board and regulatory approval, NERC staff and industry resources will be freed up and can then work on the projects in this category as prioritized by the Standards Committee.

## **V. CONCLUSION**

NERC respectfully requests that FERC approve the Proposed Reliability Standard EOP-001-0b — Emergency Operations Planning, which includes the interpretations of Requirements R 1 and R3.2 of EOP-001-0 — Emergency Operations Planning , as set out in **Exhibit C**, in accordance with Section 215(d)(1) of the FPA and Part 39.5 of FERC's regulations. NERC requests that the EOP-001-0b Reliability Standard become effective concurrent with the date of a FERC Order approving this petition. Additionally, NERC requests that the Commission approve Reliability Standard EOP-001-2b, to become effective on July 1, 2013, consistent with FERC's approval date of the EOP-001-2 Reliability Standard approved in FERC Order Nos. 748 and 749.

Gerald W. Cauley  
President and Chief Executive Officer  
3353 Peachtree Road N.E.  
Suite 600, North Tower  
Atlanta, GA 30326-1001  
David N. Cook  
Senior Vice President and General Counsel  
North American Electric Reliability  
Corporation  
1120 G Street N.W., Suite 990  
Washington, D.C. 20005-3801  
david.cook@nerc.net

Respectfully submitted,

/s/ Andrew M. Dressel  
Holly A. Hawkins  
Assistant General Counsel for Standards  
and Critical Infrastructure Protection  
Andrew M. Dressel  
Attorney  
North American Electric Reliability  
Corporation  
1120 G Street, N.W.  
Suite 990  
Washington, D.C. 20005-3801  
(202) 393-3998  
(202) 393-3955 – facsimile  
holly.hawkins@nerc.net  
andrew.dressel@nerc.net



**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing document upon all parties listed on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, D.C. this 9th day of September, 2011.

*/s/ Andrew M. Dressel*

Andrew M. Dressel  
*Attorney for North American Electric  
Reliability Corporation*

**Exhibit A**

**Interpretations of Requirement R1 and R3.2 of Reliability Standard EOP-001-0 —  
Emergency Operations Planning**

**Note: an Interpretation cannot be used to change a standard.**

Request for an Interpretation of a Reliability Standard
Date submitted: <a href="#">March 20, 2008</a>
Date accepted: <a href="#">March 20, 2008</a>
<b>Contact information for person requesting the interpretation:</b>
Name:
Organization: <a href="#">Regional Entity Compliance Managers</a>
Telephone:
E-mail: <a href="mailto:rcm@nerc.com">rcm@nerc.com</a>
<b>Identify the standard that needs clarification:</b>
Standard Number (include version number): <a href="#">EOP-001-0</a>
Standard Title: <a href="#">Emergency Operations Planning</a>
<b>Identify specifically what requirement needs clarification:</b>
<p><b>Requirement Number and Text of Requirement:</b></p> <p>R1. Balancing Authorities shall have operating agreements with adjacent Balancing Authorities that shall, at a minimum, contain provisions for emergency assistance, including provisions to obtain emergency assistance from remote Balancing Authorities.</p> <p><b>Clarification needed:</b></p> <p>The Regional Entity Compliance Managers (RECM) request a formal interpretation of Reliability Standard EOP-001-0 — Emergency Operations Planning Requirement R1 in accordance with the Reliability Standards Development Procedure.</p> <p>What is the definition of emergency assistance in the context of this standard? What scope and time horizons, if any, are considered necessary in this definition?</p> <p>What was intended by using the adjective “adjacent” in Requirement 1? Does “adjacent Balancing Authorities” mean “All” or something else? Is there qualifying criteria to determine if a very small adjacent Balancing Authority area has enough capacity to offer emergency assistance?</p> <p>What is the definition of the word “remote” as stated in the last phrase of Requirement 1? Does remote mean every Balancing Authority who’s area does not physically touch the Balancing Authority attempting to comply with this Requirement?</p> <p>Would a Balancing Authority that participates in a Reserve Sharing Group Agreement, which meets the requirements of Reliability Standard BAL-002-0, Requirement 2, have to establish additional operating</p>

agreements to achieve compliance with Reliability Standard EOP-001-0, Requirement 1?

**Identify the material impact associated with this interpretation:**

**Identify the material impact to your organization or others caused by the lack of clarity or an incorrect interpretation of this standard.** (Requesters were not required to provide this information at the time the request was submitted.)

**Revised Interpretation of EOP-001-0 Emergency Operations Planning Requirement R1 for the Regional Entity Compliance Managers (Project 2008-09)**

**Requirement Number and Text of Requirement**

R1. Balancing Authorities shall have operating agreements with adjacent Balancing Authorities that shall, at a minimum, contain provisions for emergency assistance, including provisions to obtain emergency assistance from remote Balancing Authorities.

**Question**

1. What is the definition of emergency assistance in the context of this standard? What scope and time horizons, if any, are considered necessary in this definition?
2. What was intended by using the adjective "adjacent" in Requirement 1? Does "adjacent Balancing Authorities" mean "All" or something else? Is there qualifying criteria to determine if a very small adjacent Balancing Authority area has enough capacity to offer emergency assistance?
3. What is the definition of the word "remote" as stated in the last phrase of Requirement 1? Does remote mean every Balancing Authority who's area does not physically touch the Balancing Authority attempting to comply with this Requirement?
4. Would a Balancing Authority that participates in a Reserve Sharing Group Agreement, which meets the requirements of Reliability Standard BAL-002-0, Requirement 2, have to establish additional operating agreements to achieve compliance with Reliability Standard EOP-001-0, Requirement 1?

**Response<sup>1</sup>**

<sup>1</sup> At the time of posting for this response (January 11, 2010), EOP-001-0 is the current Federal Energy Regulatory Commission (FERC)-approved version of the EOP-001 Reliability Standard in the United States and is therefore mandatory and enforceable. EOP-001-1 and EOP-001-2 have been filed with but not yet approved by FERC; therefore, EOP-001-1 and EOP-001-2 are not mandatory and enforceable in the United States at this time. The requirement in question, Requirement R2.2 of EOP-001-1 and EOP-001-2, exists in EOP-001-0 as Requirement R3.2.

1. In the context of this standard, emergency assistance is emergency energy. Emergency energy would normally be arranged for during the current operating day. The agreement should describe the conditions under which the emergency energy will be delivered to the responsible Balancing Authority.
2. The intent is that all Balancing Authorities, interconnected by AC ties or DC (asynchronous) ties within the same Interconnection, have emergency energy assistance agreements with at least one Adjacent Balancing Authority and have sufficient emergency energy assistance agreements to mitigate reasonably anticipated energy emergencies. However, the standard does not require emergency energy assistance agreements with all Adjacent Balancing Authorities, nor does it preclude having an emergency assistance agreement across Interconnections.
3. A remote Balancing Authority is a Balancing Authority other than an Adjacent Balancing Authority. A Balancing Authority is not required to have arrangements in place to obtain emergency energy assistance with any remote Balancing Authorities. A Balancing Authority's agreement(s) with Adjacent Balancing Authorities does (do) not preclude the Adjacent Balancing Authority from purchasing emergency energy from remote Balancing Authorities.
4. A Reserve Sharing Group agreement that contains provisions for emergency assistance may be used to meet Requirement R1 of EOP-001-0.

**Note: an Interpretation cannot be used to change a standard.**

Request for an Interpretation of a Reliability Standard
Date submitted: <a href="#">October 15, 2009</a>
Date accepted: <a href="#">November 30, 2009</a>
<b>Contact information for person requesting the interpretation:</b>
Name: <a href="#">Thomas E Washburn</a>
Organization: <a href="#">Florida Municipal Power Pool</a>
Telephone: <a href="#">407-384-4066</a>
E-mail: <a href="mailto:twashburn@ouc.com">twashburn@ouc.com</a>
<b>Identify the standard that needs clarification:</b>
Standard Number (include version number): <a href="#">EOP-001-1 and EOP-001-2</a>
Standard Title: <a href="#">Emergency Operations Planning</a>
<b>Identify specifically what requirement needs clarification:</b>
<b>Requirement Number and Text of Requirement:</b> <a href="#">R2.2. Develop, maintain, and implement a set of plans to mitigate operating emergencies on the transmission system.</a>
<b>Clarification needed:</b> <a href="#">According to the NERC Functional Model, the BA is responsible for maintaining load-generation-interchange balance within the BA Area and supports interconnection frequency in real-time. This is done using frequency control through tie-line bias, regulation service deployment, load-following through economic dispatch, and interchange implementation. The BA is not responsible for plans to mitigate operating emergencies on the transmission system. The BA does follow the directives of the TOP when they are implementing their plans.</a>  <a href="#">Does the BA need to develop a plan to maintain a load-interchange-generation balance during operating emergencies and follow the directives of the TOP?</a>
<b>Identify the material impact associated with this interpretation:</b>
<b>Identify the material impact to your organization or others caused by the lack of clarity or an incorrect interpretation of this standard.</b> <a href="#">Not having the correct interpretation of this requirement could cause the BA to be found non-compliant.</a>

<b>Project 2009-28: Response to Request for an Interpretation of EOP-001-1 and EOP-001-2, Requirement R2.2, for Florida Municipal Power Pool</b>
The following interpretation of EOP-001-1 and EOP-001-2 — Emergency Operations Planning, Requirement R2.2, was developed by the Project 2006-03 (System Restoration and Blackstart) drafting team.
<b>Requirement Number and Text of Requirement</b>
R2.2. Develop, maintain, and implement a set of plans to mitigate operating emergencies on the transmission system.
<b>Question</b>
Does the BA need to develop a plan to maintain a load-interchange-generation balance during operating emergencies and follow the directives of the TOP?
<b>Response<sup>1</sup></b>
The answer to both parts of the question is yes. The Balancing Authority is required by the standard to develop, maintain, and implement a plan. The plan must consider the relationships and coordination with the Transmission Operator for actions directly taken by the Balancing Authority. The Balancing Authority must take actions either as directed by the Transmission Operator or the Reliability Coordinator (reference TOP-001-1, Requirement R3), or as previously agreed to with the Transmission Operator or the Reliability Coordinator to mitigate transmission emergencies. As stated in Requirement R4, the emergency plan shall include the applicable elements in "Attachment 1 –EOP-001-0."

<sup>1</sup> At the time of posting for this response (January 11, 2010), EOP-001-0 is the current Federal Energy Regulatory Commission (FERC)-approved version of the EOP-001 Reliability Standard in the United States and is therefore mandatory and enforceable. EOP-001-1 and EOP-001-2 have been filed with but not yet approved by FERC; therefore, EOP-001-1 and EOP-001-2 are not mandatory and enforceable in the United States at this time. The requirement in question, Requirement R2.2 of EOP-001-1 and EOP-001-2, exists in EOP-001-0 as Requirement R3.2.

**Exhibit B**

**Proposed Reliability Standard EOP-001-0b — Emergency Operations Planning,  
that includes the appended interpretations of Requirements R1 and R3.2 of EOP-  
001-0 — Emergency Operations Planning**

**(Clean and Red-line)**



**A. Introduction**

- 1. Title:**           **Emergency Operations Planning**
- 2. Number:**       EOP-001-0b
- 3. Purpose:**      Each Transmission Operator and Balancing Authority needs to develop, maintain, and implement a set of plans to mitigate operating emergencies. These plans need to be coordinated with other Transmission Operators and Balancing Authorities, and the Reliability Coordinator.
- 4. Applicability**
  - 4.1.** Balancing Authorities.
  - 4.2.** Transmission Operators.
- 5. Effective Date:**                   April 1, 2005

**B. Requirements**

- R1.** Balancing Authorities shall have operating agreements with adjacent Balancing Authorities that shall, at a minimum, contain provisions for emergency assistance, including provisions to obtain emergency assistance from remote Balancing Authorities.
- R2.** The Transmission Operator shall have an emergency load reduction plan for all identified IROLs. The plan shall include the details on how the Transmission Operator will implement load reduction in sufficient amount and time to mitigate the IROL violation before system separation or collapse would occur. The load reduction plan must be capable of being implemented within 30 minutes.
- R3.** Each Transmission Operator and Balancing Authority shall:
  - R3.1.** Develop, maintain, and implement a set of plans to mitigate operating emergencies for insufficient generating capacity.
  - R3.2.** Develop, maintain, and implement a set of plans to mitigate operating emergencies on the transmission system.
  - R3.3.** Develop, maintain, and implement a set of plans for load shedding.
  - R3.4.** Develop, maintain, and implement a set of plans for system restoration.
- R4.** Each Transmission Operator and Balancing Authority shall have emergency plans that will enable it to mitigate operating emergencies. At a minimum, Transmission Operator and Balancing Authority emergency plans shall include:
  - R4.1.** Communications protocols to be used during emergencies.
  - R4.2.** A list of controlling actions to resolve the emergency. Load reduction, in sufficient quantity to resolve the emergency within NERC-established timelines, shall be one of the controlling actions.
  - R4.3.** The tasks to be coordinated with and among adjacent Transmission Operators and Balancing Authorities.
  - R4.4.** Staffing levels for the emergency.
- R5.** Each Transmission Operator and Balancing Authority shall include the applicable elements in Attachment 1-EOP-001-0b when developing an emergency plan.

- R6.** The Transmission Operator and Balancing Authority shall annually review and update each emergency plan. The Transmission Operator and Balancing Authority shall provide a copy of its updated emergency plans to its Reliability Coordinator and to neighboring Transmission Operators and Balancing Authorities.
- R7.** The Transmission Operator and Balancing Authority shall coordinate its emergency plans with other Transmission Operators and Balancing Authorities as appropriate. This coordination includes the following steps, as applicable:
  - R7.1.** The Transmission Operator and Balancing Authority shall establish and maintain reliable communications between interconnected systems.
  - R7.2.** The Transmission Operator and Balancing Authority shall arrange new interchange agreements to provide for emergency capacity or energy transfers if existing agreements cannot be used.
  - R7.3.** The Transmission Operator and Balancing Authority shall coordinate transmission and generator maintenance schedules to maximize capacity or conserve the fuel in short supply. (This includes water for hydro generators.)
  - R7.4.** The Transmission Operator and Balancing Authority shall arrange deliveries of electrical energy or fuel from remote systems through normal operating channels.

#### **C. Measures**

- M1.** The Transmission Operator and Balancing Authority shall have its emergency plans available for review by the Regional Reliability Organization at all times.
- M2.** The Transmission Operator and Balancing Authority shall have its two most recent annual self-assessments available for review by the Regional Reliability Organization at all times.

#### **D. Compliance**

##### **1. Compliance Monitoring Process**

###### **1.1. Compliance Monitoring Responsibility**

Regional Reliability Organization.

###### **1.2. Compliance Monitoring Period and Reset Timeframes**

The Regional Reliability Organization shall review and evaluate emergency plans every three years to ensure that the plans consider the applicable elements of Attachment 1-EOP-001-0b.

The Regional Reliability Organization may elect to request self-certification of the Transmission Operator and Balancing Authority in years that the full review is not done.

Reset: one calendar year.

###### **1.3. Data Retention**

Current plan available at all times.

###### **1.4. Additional Compliance Information**

Not specified.

##### **2. Levels of Non-Compliance**

- 2.1. Level 1:** One of the applicable elements of Attachment 1-EOP-001-0b has not been addressed in the emergency plans.

- 2.2. Level 2:** Two of the applicable elements of Attachment 1-EOP-001-0b have not been addressed in the emergency plans.
- 2.3. Level 3:** Three of the applicable elements of Attachment 1-EOP-001-0b have not been addressed in the emergency plans.
- 2.4. Level 4:** Four or more of the applicable elements of Attachment 1-EOP-001-0b have not been addressed in the emergency plans or a plan does not exist.

**E. Regional Differences**

None identified.

**Version History**

<b>Version</b>	<b>Date</b>	<b>Action</b>	<b>Change Tracking</b>
0	February 8, 2005	Adopted by the Board of Trustees	New
0	April 1, 2005	Effective Date	New
0	August 8, 2005	Removed “Proposed” from Effective Date	Errata
0b	November 4, 2010	Adopted by the Board of Trustees	Project 2008-09 - Interpretation of Requirement R1
0b	November 4, 2010	Adopted by the Board of Trustees	Project 2009-28 - Interpretation of Requirement R2.2

## **Attachment 1-EOP-001-0b**

### **Elements for Consideration in Development of Emergency Plans**

1. Fuel supply and inventory — An adequate fuel supply and inventory plan that recognizes reasonable delays or problems in the delivery or production of fuel.
2. Fuel switching — Fuel switching plans for units for which fuel supply shortages may occur, e.g., gas and light oil.
3. Environmental constraints — Plans to seek removal of environmental constraints for generating units and plants.
4. System energy use — The reduction of the system’s own energy use to a minimum.
5. Public appeals — Appeals to the public through all media for voluntary load reductions and energy conservation including educational messages on how to accomplish such load reduction and conservation.
6. Load management — Implementation of load management and voltage reductions, if appropriate.
7. Optimize fuel supply — The operation of all generating sources to optimize the availability.
8. Appeals to customers to use alternate fuels — In a fuel emergency, appeals to large industrial and commercial customers to reduce non-essential energy use and maximize the use of customer-owned generation that rely on fuels other than the one in short supply.
9. Interruptible and curtailable loads — Use of interruptible and curtailable customer load to reduce capacity requirements or to conserve the fuel in short supply.
10. Maximizing generator output and availability — The operation of all generating sources to maximize output and availability. This should include plans to winterize units and plants during extreme cold weather.
11. Notifying IPPs — Notification of cogeneration and independent power producers to maximize output and availability.
12. Requests of government — Requests to appropriate government agencies to implement programs to achieve necessary energy reductions.
13. Load curtailment — A mandatory load curtailment plan to use as a last resort. This plan should address the needs of critical loads essential to the health, safety, and welfare of the community. Address firm load curtailment.
14. Notification of government agencies — Notification of appropriate government agencies as the various steps of the emergency plan are implemented.
15. Notifications to operating entities — Notifications to other operating entities as steps in emergency plan are implemented.

## Appendix 1

<b>Requirement Number and Text of Requirement</b>	
R1.	Balancing Authorities shall have operating agreements with adjacent Balancing Authorities that shall, at a minimum, contain provisions for emergency assistance, including provisions to obtain emergency assistance from remote Balancing Authorities.
<b>Questions:</b>	
1.	What is the definition of emergency assistance in the context of this standard? What scope and time horizons, if any, are considered necessary in this definition?
2.	What was intended by using the adjective “adjacent” in Requirement 1? Does “adjacent Balancing Authorities” mean “All” or something else? Is there qualifying criteria to determine if a very small adjacent Balancing Authority area has enough capacity to offer emergency assistance?
3.	What is the definition of the word “remote” as stated in the last phrase of Requirement 1? Does remote mean every Balancing Authority who’s area does not physically touch the Balancing Authority attempting to comply with this Requirement?
4.	Would a Balancing Authority that participates in a Reserve Sharing Group Agreement, which meets the requirements of Reliability Standard BAL-002-0, Requirement 2, have to establish additional operating agreements to achieve compliance with Reliability Standard EOP-001-0, Requirement 1?
<b>Responses:</b>	
1.	In the context of this standard, emergency assistance is emergency energy. Emergency energy would normally be arranged for during the current operating day. The agreement should describe the conditions under which the emergency energy will be delivered to the responsible Balancing Authority.
2.	The intent is that all Balancing Authorities, interconnected by AC ties or DC (asynchronous) ties within the same Interconnection, have emergency energy assistance agreements with at least one Adjacent Balancing Authority and have sufficient emergency energy assistance agreements to mitigate reasonably anticipated energy emergencies. However, the standard does not require emergency energy assistance agreements with all Adjacent Balancing Authorities, nor does it preclude having an emergency assistance agreement across Interconnections.
3.	A remote Balancing Authority is a Balancing Authority other than an Adjacent Balancing Authority. A Balancing Authority is not required to have arrangements in place to obtain emergency energy assistance with any remote Balancing Authorities. A Balancing Authority’s agreement(s) with Adjacent Balancing Authorities does (do) not preclude the Adjacent Balancing Authority from purchasing emergency energy from remote Balancing Authorities.
4.	A Reserve Sharing Group agreement that contains provisions for emergency assistance may be used to meet Requirement R1 of EOP-001-0.

## Appendix 2

<b>Requirement Number and Text of Requirement</b>
R2.2. Develop, maintain, and implement a set of plans to mitigate operating emergencies on the transmission system.
<b>Questions:</b>
Does the BA need to develop a plan to maintain a load-interchange-generation balance during operating emergencies and follow the directives of the TOP?
<b>Questions:</b>
The answer to both parts of the question is yes. The Balancing Authority is required by the standard to develop, maintain, and implement a plan. The plan must consider the relationships and coordination with the Transmission Operator for actions directly taken by the Balancing Authority. The Balancing Authority must take actions either as directed by the Transmission Operator or the Reliability Coordinator (reference TOP-001-1, Requirement R3), or as previously agreed to with the Transmission Operator or the Reliability Coordinator to mitigate transmission emergencies. As stated in Requirement R4, the emergency plan shall include the applicable elements in “Attachment 1 –EOP-001-0.”

**A. Introduction**

- 1. Title:** **Emergency Operations Planning**
- 2. Number:** EOP-001-~~00b~~
- 3. Purpose:** Each Transmission Operator and Balancing Authority needs to develop, maintain, and implement a set of plans to mitigate operating emergencies. These plans need to be coordinated with other Transmission Operators and Balancing Authorities, and the Reliability Coordinator.
- 4. Applicability**
  - 4.1.** Balancing Authorities.
  - 4.2.** Transmission Operators.
- 5. Effective Date:** April 1, 2005

**B. Requirements**

- R1.** Balancing Authorities shall have operating agreements with adjacent Balancing Authorities that shall, at a minimum, contain provisions for emergency assistance, including provisions to obtain emergency assistance from remote Balancing Authorities.
- R2.** The Transmission Operator shall have an emergency load reduction plan for all identified IROLs. The plan shall include the details on how the Transmission Operator will implement load reduction in sufficient amount and time to mitigate the IROL violation before system separation or collapse would occur. The load reduction plan must be capable of being implemented within 30 minutes.
- R3.** Each Transmission Operator and Balancing Authority shall:
  - R3.1.** Develop, maintain, and implement a set of plans to mitigate operating emergencies for insufficient generating capacity.
  - R3.2.** Develop, maintain, and implement a set of plans to mitigate operating emergencies on the transmission system.
  - R3.3.** Develop, maintain, and implement a set of plans for load shedding.
  - R3.4.** Develop, maintain, and implement a set of plans for system restoration.
- R4.** Each Transmission Operator and Balancing Authority shall have emergency plans that will enable it to mitigate operating emergencies. At a minimum, Transmission Operator and Balancing Authority emergency plans shall include:
  - R4.1.** Communications protocols to be used during emergencies.
  - R4.2.** A list of controlling actions to resolve the emergency. Load reduction, in sufficient quantity to resolve the emergency within NERC-established timelines, shall be one of the controlling actions.
  - R4.3.** The tasks to be coordinated with and among adjacent Transmission Operators and Balancing Authorities.
  - R4.4.** Staffing levels for the emergency.
- R5.** Each Transmission Operator and Balancing Authority shall include the applicable elements in Attachment 1-EOP-001-~~00b~~ when developing an emergency plan.

- R6.** The Transmission Operator and Balancing Authority shall annually review and update each emergency plan. The Transmission Operator and Balancing Authority shall provide a copy of its updated emergency plans to its Reliability Coordinator and to neighboring Transmission Operators and Balancing Authorities.
- R7.** The Transmission Operator and Balancing Authority shall coordinate its emergency plans with other Transmission Operators and Balancing Authorities as appropriate. This coordination includes the following steps, as applicable:
  - R7.1.** The Transmission Operator and Balancing Authority shall establish and maintain reliable communications between interconnected systems.
  - R7.2.** The Transmission Operator and Balancing Authority shall arrange new interchange agreements to provide for emergency capacity or energy transfers if existing agreements cannot be used.
  - R7.3.** The Transmission Operator and Balancing Authority shall coordinate transmission and generator maintenance schedules to maximize capacity or conserve the fuel in short supply. (This includes water for hydro generators.)
  - R7.4.** The Transmission Operator and Balancing Authority shall arrange deliveries of electrical energy or fuel from remote systems through normal operating channels.

#### C. Measures

- M1.** The Transmission Operator and Balancing Authority shall have its emergency plans available for review by the Regional Reliability Organization at all times.
- M2.** The Transmission Operator and Balancing Authority shall have its two most recent annual self-assessments available for review by the Regional Reliability Organization at all times.

#### D. Compliance

##### 1. Compliance Monitoring Process

###### 1.1. Compliance Monitoring Responsibility

Regional Reliability Organization.

###### 1.2. Compliance Monitoring Period and Reset Timeframes

The Regional Reliability Organization shall review and evaluate emergency plans every three years to ensure that the plans consider the applicable elements of Attachment 1-EOP-001-~~00b~~.

The Regional Reliability Organization may elect to request self-certification of the Transmission Operator and Balancing Authority in years that the full review is not done.

Reset: one calendar year.

###### 1.3. Data Retention

Current plan available at all times.

###### 1.4. Additional Compliance Information

Not specified.

##### 2. Levels of Non-Compliance

- 2.1. Level 1:** One of the applicable elements of Attachment 1-EOP-001-~~00b~~ has not been addressed in the emergency plans.



- 2.2. **Level 2:** Two of the applicable elements of Attachment 1-EOP-001-~~00b~~ have not been addressed in the emergency plans.
- 2.3. **Level 3:** Three of the applicable elements of Attachment 1-EOP-001-~~00b~~ have not been addressed in the emergency plans.
- 2.4. **Level 4:** Four or more of the applicable elements of Attachment 1-EOP-001-~~00b~~ have not been addressed in the emergency plans or a plan does not exist.

**E. Regional Differences**

None identified.

**Version History**

Version	Date	Action	Change Tracking
<u>0</u>	<u>February 8, 2005</u>	<u>Adopted by the Board of Trustees</u>	<u>New</u>
0	April 1, 2005	Effective Date	New
0	August 8, 2005	Removed “Proposed” from Effective Date	Errata
<u>0b</u>	<u>November 4, 2010</u>	<u>Adopted by the Board of Trustees</u>	<u>Project 2008-09 - Interpretation of Requirement R1</u>
<u>0b</u>	<u>November 4, 2010</u>	<u>Adopted by the Board of Trustees</u>	<u>Project 2009-28 - Interpretation of Requirement R2.2</u>

## **Attachment 1-EOP-001-~~00b~~**

### **Elements for Consideration in Development of Emergency Plans**

1. Fuel supply and inventory — An adequate fuel supply and inventory plan that recognizes reasonable delays or problems in the delivery or production of fuel.
2. Fuel switching — Fuel switching plans for units for which fuel supply shortages may occur, e.g., gas and light oil.
3. Environmental constraints — Plans to seek removal of environmental constraints for generating units and plants.
4. System energy use — The reduction of the system’s own energy use to a minimum.
5. Public appeals — Appeals to the public through all media for voluntary load reductions and energy conservation including educational messages on how to accomplish such load reduction and conservation.
6. Load management — Implementation of load management and voltage reductions, if appropriate.
7. Optimize fuel supply — The operation of all generating sources to optimize the availability.
8. Appeals to customers to use alternate fuels — In a fuel emergency, appeals to large industrial and commercial customers to reduce non-essential energy use and maximize the use of customer-owned generation that rely on fuels other than the one in short supply.
9. Interruptible and curtailable loads — Use of interruptible and curtailable customer load to reduce capacity requirements or to conserve the fuel in short supply.
10. Maximizing generator output and availability — The operation of all generating sources to maximize output and availability. This should include plans to winterize units and plants during extreme cold weather.
11. Notifying IPPs — Notification of cogeneration and independent power producers to maximize output and availability.
12. Requests of government — Requests to appropriate government agencies to implement programs to achieve necessary energy reductions.
13. Load curtailment — A mandatory load curtailment plan to use as a last resort. This plan should address the needs of critical loads essential to the health, safety, and welfare of the community. Address firm load curtailment.
14. Notification of government agencies — Notification of appropriate government agencies as the various steps of the emergency plan are implemented.
15. Notifications to operating entities — Notifications to other operating entities as steps in emergency plan are implemented.

## Appendix 1

### Requirement Number and Text of Requirement

R1. Balancing Authorities shall have operating agreements with adjacent Balancing Authorities that shall, at a minimum, contain provisions for emergency assistance, including provisions to obtain emergency assistance from remote Balancing Authorities.

### Questions:

1. What is the definition of emergency assistance in the context of this standard? What scope and time horizons, if any, are considered necessary in this definition?
2. What was intended by using the adjective “adjacent” in Requirement 1? Does “adjacent Balancing Authorities” mean “All” or something else? Is there qualifying criteria to determine if a very small adjacent Balancing Authority area has enough capacity to offer emergency assistance?
3. What is the definition of the word “remote” as stated in the last phrase of Requirement 1? Does remote mean every Balancing Authority who’s area does not physically touch the Balancing Authority attempting to comply with this Requirement?
4. Would a Balancing Authority that participates in a Reserve Sharing Group Agreement, which meets the requirements of Reliability Standard BAL-002-0, Requirement 2, have to establish additional operating agreements to achieve compliance with Reliability Standard EOP-001-0, Requirement 1?

### Responses:

1. In the context of this standard, emergency assistance is emergency energy. Emergency energy would normally be arranged for during the current operating day. The agreement should describe the conditions under which the emergency energy will be delivered to the responsible Balancing Authority.
2. The intent is that all Balancing Authorities, interconnected by AC ties or DC (asynchronous) ties within the same Interconnection, have emergency energy assistance agreements with at least one Adjacent Balancing Authority and have sufficient emergency energy assistance agreements to mitigate reasonably anticipated energy emergencies. However, the standard does not require emergency energy assistance agreements with all Adjacent Balancing Authorities, nor does it preclude having an emergency assistance agreement across Interconnections.
3. A remote Balancing Authority is a Balancing Authority other than an Adjacent Balancing Authority. A Balancing Authority is not required to have arrangements in place to obtain emergency energy assistance with any remote Balancing Authorities. A Balancing Authority’s agreement(s) with Adjacent Balancing Authorities does (do) not preclude the Adjacent Balancing Authority from purchasing emergency energy from remote Balancing Authorities.
4. A Reserve Sharing Group agreement that contains provisions for emergency assistance may be used to meet Requirement R1 of EOP-001-0.

## Appendix 2

### Requirement Number and Text of Requirement

R2.2. Develop, maintain, and implement a set of plans to mitigate operating emergencies on the transmission system.

#### Questions:

Does the BA need to develop a plan to maintain a load-interchange-generation balance during operating emergencies and follow the directives of the TOP?

#### Questions:

The answer to both parts of the question is yes. The Balancing Authority is required by the standard to develop, maintain, and implement a plan. The plan must consider the relationships and coordination with the Transmission Operator for actions directly taken by the Balancing Authority. The Balancing Authority must take actions either as directed by the Transmission Operator or the Reliability Coordinator (reference TOP-001-1, Requirement R3), or as previously agreed to with the Transmission Operator or the Reliability Coordinator to mitigate transmission emergencies. As stated in Requirement R4, the emergency plan shall include the applicable elements in “Attachment 1 –EOP-001-0.”

15.

**Exhibit C**

**Proposed Reliability Standard EOP-001-2b — Emergency Operations Planning,  
that includes the appended interpretations of Requirements R1 and R2.2 of EOP-  
001-0 — Emergency Operations Planning**

**(Clean and Red-line)**

## A. Introduction

1. **Title:** **Emergency Operations Planning**
2. **Number:** EOP-001-2b
3. **Purpose:** Each Transmission Operator and Balancing Authority needs to develop, maintain, and implement a set of plans to mitigate operating emergencies. These plans need to be coordinated with other Transmission Operators and Balancing Authorities, and the Reliability Coordinator.
4. **Applicability**
  - 4.1. Balancing Authorities.
  - 4.2. Transmission Operators.
5. **Proposed Effective Date:** Twenty-four months after the first day of the first calendar quarter following applicable regulatory approval. In those jurisdictions where no regulatory approval is required, all requirements go into effect twenty-four months after Board of Trustees adoption.

## B. Requirements

- R1. Balancing Authorities shall have operating agreements with adjacent Balancing Authorities that shall, at a minimum, contain provisions for emergency assistance, including provisions to obtain emergency assistance from remote Balancing Authorities.
- R2. Each Transmission Operator and Balancing Authority shall:
  - R2.1. Develop, maintain, and implement a set of plans to mitigate operating emergencies for insufficient generating capacity.
  - R2.2. Develop, maintain, and implement a set of plans to mitigate operating emergencies on the transmission system.
  - R2.3. Develop, maintain, and implement a set of plans for load shedding.
- R3. Each Transmission Operator and Balancing Authority shall have emergency plans that will enable it to mitigate operating emergencies. At a minimum, Transmission Operator and Balancing Authority emergency plans shall include:
  - R3.1. Communications protocols to be used during emergencies.
  - R3.2. A list of controlling actions to resolve the emergency. Load reduction, in sufficient quantity to resolve the emergency within NERC-established timelines, shall be one of the controlling actions.
  - R3.3. The tasks to be coordinated with and among adjacent Transmission Operators and Balancing Authorities.
  - R3.4. Staffing levels for the emergency.
- R4. Each Transmission Operator and Balancing Authority shall include the applicable elements in Attachment 1-EOP-001-0b when developing an emergency plan.
- R5. The Transmission Operator and Balancing Authority shall annually review and update each emergency plan. The Transmission Operator and Balancing Authority shall provide a copy of its updated emergency plans to its Reliability Coordinator and to neighboring Transmission Operators and Balancing Authorities.

**R6.** The Transmission Operator and Balancing Authority shall coordinate its emergency plans with other Transmission Operators and Balancing Authorities as appropriate. This coordination includes the following steps, as applicable:

**R6.1.** The Transmission Operator and Balancing Authority shall establish and maintain reliable communications between interconnected systems.

**R6.2.** The Transmission Operator and Balancing Authority shall arrange new interchange agreements to provide for emergency capacity or energy transfers if existing agreements cannot be used.

**R6.3.** The Transmission Operator and Balancing Authority shall coordinate transmission and generator maintenance schedules to maximize capacity or conserve the fuel in short supply. (This includes water for hydro generators.)

**R6.4.** The Transmission Operator and Balancing Authority shall arrange deliveries of electrical energy or fuel from remote systems through normal operating channels.

#### **C. Measures**

**M1.** The Transmission Operator and Balancing Authority shall have its emergency plans available for review by the Regional Reliability Organization at all times.

**M2.** The Transmission Operator and Balancing Authority shall have its two most recent annual self-assessments available for review by the Regional Reliability Organization at all times.

#### **D. Compliance**

##### **1. Compliance Monitoring Process**

###### **1.1. Compliance Monitoring Responsibility**

Regional Reliability Organization.

###### **1.2. Compliance Monitoring Period and Reset Time Frame**

The Regional Reliability Organization shall review and evaluate emergency plans every three years to ensure that the plans consider the applicable elements of Attachment 1-EOP-001-0b.

The Regional Reliability Organization may elect to request self-certification of the Transmission Operator and Balancing Authority in years that the full review is not done.

Reset: one calendar year.

###### **1.3. Data Retention**

Current plan available at all times.

###### **1.4. Additional Compliance Information**

Not specified.

2. Violation Severity Levels:

Requirement	Lower	Moderate	High	Severe
R1	The Balancing Authority failed to demonstrate the existence of the necessary operating agreements for less than 25% of the adjacent BAs. Or less than 25% of those agreements do not contain provisions for emergency assistance.	The Balancing Authority failed to demonstrate the existence of the necessary operating agreements for 25% to 50% of the adjacent BAs. Or 25 to 50% of those agreements do not contain provisions for emergency assistance.	The Balancing Authority failed to demonstrate the existence of the necessary operating agreements for 50% to 75% of the adjacent BAs. Or 50% to 75% of those agreements do not contain provisions for emergency assistance.	The Balancing Authority failed to demonstrate the existence of the necessary operating agreements for 75% or more of the adjacent BAs. Or more than 75% of those agreements do not contain provisions for emergency assistance.
R2	The Transmission Operator or Balancing Authority failed to comply with one (1) of the sub-components.	The Transmission Operator or Balancing Authority failed to comply with two (2) of the sub-components.	N/A	The Transmission Operator or Balancing Authority has failed to comply with three (3) of the sub-components.
R2.1	The Transmission Operator or Balancing Authority's emergency plans to mitigate insufficient generating capacity are missing minor details or minor program/procedural elements.	The Transmission Operator or Balancing Authority's has demonstrated the existence of emergency plans to mitigate insufficient generating capacity emergency plans but the plans are not maintained.	The Transmission Operator or Balancing Authority's emergency plans to mitigate insufficient generating capacity emergency plans are neither maintained nor implemented.	The Transmission Operator or Balancing Authority has failed to develop emergency mitigation plans for insufficient generating capacity.
R2.2	The Transmission Operator or Balancing Authority's plans to mitigate transmission system emergencies are missing minor details or minor program/procedural elements.	The Transmission Operator or Balancing Authority's has demonstrated the existence of transmission system emergency plans but are not maintained.	The Transmission Operator or Balancing Authority's transmission system emergency plans are neither maintained nor implemented.	The Transmission Operator or Balancing Authority has failed to develop, maintain, and implement operating emergency mitigation plans for emergencies on the transmission system.



Requirement	Lower	Moderate	High	Severe
R2.3	The Transmission Operator or Balancing Authority's load shedding plans are missing minor details or minor program/procedural elements.	The Transmission Operator or Balancing Authority's has demonstrated the existence of load shedding plans but are not maintained.	The Transmission Operator or Balancing Authority's load shedding plans are partially compliant with the requirement but are neither maintained nor implemented.	The Transmission Operator or Balancing Authority has failed to develop, maintain, and implement load shedding plans.
R3	The Transmission Operator or Balancing Authority failed to comply with one (1) of the sub-components.	The Transmission Operator or Balancing Authority failed to comply with two (2) of the sub-components.	The Transmission Operator or Balancing Authority has failed to comply with three (3) of the sub-components.	The Transmission Operator or Balancing Authority has failed to comply with all four (4) of the sub-components.
R3.1	The Transmission Operator or Balancing Authority's communication protocols included in the emergency plan are missing minor program/procedural elements.	N/A	N/A	The Transmission Operator or Balancing Authority has failed to include communication protocols in its emergency plans to mitigate operating emergencies.
R3.2	The Transmission Operator or Balancing Authority's list of controlling actions has resulted in meeting the intent of the requirement but is missing minor program/procedural elements.	N/A	The Transmission Operator or Balancing Authority provided a list of controlling actions, however the actions fail to resolve the emergency within NERC-established timelines.	The Transmission Operator or Balancing Authority has failed to provide a list of controlling actions to resolve the emergency.

Requirement	Lower	Moderate	High	Severe
R3.3	The Transmission Operator or Balancing Authority has demonstrated coordination with Transmission Operators and Balancing Authorities but is missing minor program/procedural elements.	N/A	N/A	The Transmission Operator or Balancing Authority has failed to demonstrate the tasks to be coordinated with adjacent Transmission Operator and Balancing Authorities as directed by the requirement.
R3.4	The Transmission Operator or Balancing Authority's emergency plan does not include staffing levels for the emergency	N/A	N/A	N/A
R4	The Transmission Operator and Balancing Authority's emergency plan has complied with 90% or more of the number of sub-components.	The Transmission Operator and Balancing Authority's emergency plan has complied with 70% to 90% of the number of sub-components.	The Transmission Operator and Balancing Authority's emergency plan has complied with between 50% to 70% of the number of sub-components.	The Transmission Operator and Balancing Authority's emergency plan has complied with 50% or less of the number of sub-components
R5	The Transmission Operator and Balancing Authority is missing minor program/procedural elements.	The Transmission Operator and Balancing Authority has failed to annually review one of it's emergency plans	The Transmission Operator and Balancing Authority has failed to annually review two of its emergency plans or communicate with one of it's neighboring Balancing Authorities.	The Transmission Operator and Balancing Authority has failed to annually review and/or communicate any emergency plans with its Reliability Coordinator, neighboring Transmission Operators or Balancing Authorities.
R6	The Transmission Operator and/or the Balancing Authority failed to comply with one (1) of the sub-components.	The Transmission Operator and/or the Balancing Authority failed to comply with two (2) of the sub-components.	The Transmission Operator and/or the Balancing Authority has failed to comply with three (3) of the sub-components.	The Transmission Operator and/or the Balancing Authority has failed to comply with four (4) or more of the sub-components.

Requirement	Lower	Moderate	High	Severe
R6.1	The Transmission Operator or Balancing Authority has failed to establish and maintain reliable communication between interconnected systems.	N/A	N/A	N/A
R6.2	The Transmission Operator or Balancing Authority has failed to arrange new interchange agreements to provide for emergency capacity or energy transfers with required entities when existing agreements could not be used.	N/A	N/A	N/A
R6.3	The Transmission Operator or Balancing Authority has failed to coordinate transmission and generator maintenance schedules to maximize capacity or conserve fuel in short supply.	N/A	N/A	N/A
R6.4	The Transmission Operator or Balancing Authority has failed to arrange for deliveries of electrical energy or fuel from remote systems through normal operating channels.	N/A	N/A	N/A

**E. Regional Differences**

None identified.

**Version History**

<b>Version</b>	<b>Date</b>	<b>Action</b>	<b>Change Tracking</b>
0	February 8, 2005	Adopted by the Board of Trustees	New
0	April 1, 2005	Effective Date	New
0	August 8, 2005	Removed “Proposed” from Effective Date	Errata
1	October 17, 2008	Deleted R2 Replaced Levels of Non-compliance with the February 28, 2008 BOT approved Violation Severity Levels Corrected typographical errors in BOT approved version of VSLs	Revised IROL Project
2	August 5, 2009	Removed R2.4 as redundant with EOP-005-2 Requirement R1 for the Transmission Operator; the Balancing Authority does not need a restoration plan.	Revised Project 2006-03
2	August 5, 2009	Adopted by NERC Board of Trustees: August 5, 2009	Revised
2	March 17, 2011	FERC Order issued approving EOP-001-2 (Clarification issued on July 13, 2011)	Revised
2b	November 4, 2010	Adopted by NERC Board of Trustees	Project 2008-09 - Interpretation of Requirement R1
2b	November 4, 2010	Adopted by NERC Board of Trustees	Project 2009-28 - Interpretation of Requirement R2.2

**Attachment 1-EOP-001-0b**

**Elements for Consideration in Development of Emergency Plans**

1. Fuel supply and inventory — An adequate fuel supply and inventory plan that recognizes reasonable delays or problems in the delivery or production of fuel.
2. Fuel switching — Fuel switching plans for units for which fuel supply shortages may occur, e.g., gas and light oil.
3. Environmental constraints — Plans to seek removal of environmental constraints for generating units and plants.
4. System energy use — The reduction of the system's own energy use to a minimum.
5. Public appeals — Appeals to the public through all media for voluntary load reductions and energy conservation including educational messages on how to accomplish such load reduction and conservation.
6. Load management — Implementation of load management and voltage reductions, if appropriate.
7. Optimize fuel supply — The operation of all generating sources to optimize the availability.
8. Appeals to customers to use alternate fuels — In a fuel emergency, appeals to large industrial and commercial customers to reduce non-essential energy use and maximize the use of customer-owned generation that rely on fuels other than the one in short supply.
9. Interruptible and curtailable loads — Use of interruptible and curtailable customer load to reduce capacity requirements or to conserve the fuel in short supply.
10. Maximizing generator output and availability — The operation of all generating sources to maximize output and availability. This should include plans to winterize units and plants during extreme cold weather.
11. Notifying IPPs — Notification of cogeneration and independent power producers to maximize output and availability.
12. Requests of government — Requests to appropriate government agencies to implement programs to achieve necessary energy reductions.
13. Load curtailment — A mandatory load curtailment plan to use as a last resort. This plan should address the needs of critical loads essential to the health, safety, and welfare of the community. Address firm load curtailment.
14. Notification of government agencies — Notification of appropriate government agencies as the various steps of the emergency plan are implemented.
15. Notifications to operating entities — Notifications to other operating entities as steps in emergency plan are implemented.

## Appendix 1

<b>Requirement Number and Text of Requirement</b>
<p>R1. Balancing Authorities shall have operating agreements with adjacent Balancing Authorities that shall, at a minimum, contain provisions for emergency assistance, including provisions to obtain emergency assistance from remote Balancing Authorities.</p>
<b>Questions:</b>
<ol style="list-style-type: none"> <li>1. What is the definition of emergency assistance in the context of this standard? What scope and time horizons, if any, are considered necessary in this definition?</li> <li>2. What was intended by using the adjective “adjacent” in Requirement 1? Does “adjacent Balancing Authorities” mean “All” or something else? Is there qualifying criteria to determine if a very small adjacent Balancing Authority area has enough capacity to offer emergency assistance?</li> <li>3. What is the definition of the word “remote” as stated in the last phrase of Requirement 1? Does remote mean every Balancing Authority who’s area does not physically touch the Balancing Authority attempting to comply with this Requirement?</li> <li>4. Would a Balancing Authority that participates in a Reserve Sharing Group Agreement, which meets the requirements of Reliability Standard BAL-002-0, Requirement 2, have to establish additional operating agreements to achieve compliance with Reliability Standard EOP-001-0, Requirement 1?</li> </ol>
<b>Responses:</b>
<ol style="list-style-type: none"> <li>1. In the context of this standard, emergency assistance is emergency energy. Emergency energy would normally be arranged for during the current operating day. The agreement should describe the conditions under which the emergency energy will be delivered to the responsible Balancing Authority.</li> <li>2. The intent is that all Balancing Authorities, interconnected by AC ties or DC (asynchronous) ties within the same Interconnection, have emergency energy assistance agreements with at least one Adjacent Balancing Authority and have sufficient emergency energy assistance agreements to mitigate reasonably anticipated energy emergencies. However, the standard does not require emergency energy assistance agreements with all Adjacent Balancing Authorities, nor does it preclude having an emergency assistance agreement across Interconnections.</li> <li>3. A remote Balancing Authority is a Balancing Authority other than an Adjacent Balancing Authority. A Balancing Authority is not required to have arrangements in place to obtain emergency energy assistance with any remote Balancing Authorities. A Balancing Authority’s agreement(s) with Adjacent Balancing Authorities does (do) not preclude the Adjacent Balancing Authority from purchasing emergency energy from remote Balancing Authorities.</li> <li>4. A Reserve Sharing Group agreement that contains provisions for emergency assistance may be used to meet Requirement R1 of EOP-001-0.</li> </ol>

## Appendix 2

<b>Requirement Number and Text of Requirement</b>
R2.2. Develop, maintain, and implement a set of plans to mitigate operating emergencies on the transmission system.
<b>Questions:</b>
Does the BA need to develop a plan to maintain a load-interchange-generation balance during operating emergencies and follow the directives of the TOP?
<b>Questions:</b>
The answer to both parts of the question is yes. The Balancing Authority is required by the standard to develop, maintain, and implement a plan. The plan must consider the relationships and coordination with the Transmission Operator for actions directly taken by the Balancing Authority. The Balancing Authority must take actions either as directed by the Transmission Operator or the Reliability Coordinator (reference TOP-001-1, Requirement R3), or as previously agreed to with the Transmission Operator or the Reliability Coordinator to mitigate transmission emergencies. As stated in Requirement R4, the emergency plan shall include the applicable elements in “Attachment 1 –EOP-001-0.”

## A. Introduction

1. **Title:** **Emergency Operations Planning**
2. **Number:** EOP-001-~~22b~~
3. **Purpose:** Each Transmission Operator and Balancing Authority needs to develop, maintain, and implement a set of plans to mitigate operating emergencies. These plans need to be coordinated with other Transmission Operators and Balancing Authorities, and the Reliability Coordinator.
4. **Applicability**
  - 4.1. Balancing Authorities.
  - 4.2. Transmission Operators.
5. **Proposed Effective Date:** Twenty-four months after the first day of the first calendar quarter following applicable regulatory approval. In those jurisdictions where no regulatory approval is required, all requirements go into effect twenty-four months after Board of Trustees adoption.

## B. Requirements

- R1. Balancing Authorities shall have operating agreements with adjacent Balancing Authorities that shall, at a minimum, contain provisions for emergency assistance, including provisions to obtain emergency assistance from remote Balancing Authorities.
- R2. Each Transmission Operator and Balancing Authority shall:
  - R2.1. Develop, maintain, and implement a set of plans to mitigate operating emergencies for insufficient generating capacity.
  - R2.2. Develop, maintain, and implement a set of plans to mitigate operating emergencies on the transmission system.
  - R2.3. Develop, maintain, and implement a set of plans for load shedding.
- R3. Each Transmission Operator and Balancing Authority shall have emergency plans that will enable it to mitigate operating emergencies. At a minimum, Transmission Operator and Balancing Authority emergency plans shall include:
  - R3.1. Communications protocols to be used during emergencies.
  - R3.2. A list of controlling actions to resolve the emergency. Load reduction, in sufficient quantity to resolve the emergency within NERC-established timelines, shall be one of the controlling actions.
  - R3.3. The tasks to be coordinated with and among adjacent Transmission Operators and Balancing Authorities.
  - R3.4. Staffing levels for the emergency.
- R4. Each Transmission Operator and Balancing Authority shall include the applicable elements in Attachment 1-EOP-001-~~00b~~ when developing an emergency plan.
- R5. The Transmission Operator and Balancing Authority shall annually review and update each emergency plan. The Transmission Operator and Balancing Authority shall provide a copy of its updated emergency plans to its Reliability Coordinator and to neighboring Transmission Operators and Balancing Authorities.



**R6.** The Transmission Operator and Balancing Authority shall coordinate its emergency plans with other Transmission Operators and Balancing Authorities as appropriate. This coordination includes the following steps, as applicable:

**R6.1.** The Transmission Operator and Balancing Authority shall establish and maintain reliable communications between interconnected systems.

**R6.2.** The Transmission Operator and Balancing Authority shall arrange new interchange agreements to provide for emergency capacity or energy transfers if existing agreements cannot be used.

**R6.3.** The Transmission Operator and Balancing Authority shall coordinate transmission and generator maintenance schedules to maximize capacity or conserve the fuel in short supply. (This includes water for hydro generators.)

**R6.4.** The Transmission Operator and Balancing Authority shall arrange deliveries of electrical energy or fuel from remote systems through normal operating channels.

### C. Measures

**M1.** The Transmission Operator and Balancing Authority shall have its emergency plans available for review by the Regional Reliability Organization at all times.

**M2.** The Transmission Operator and Balancing Authority shall have its two most recent annual self-assessments available for review by the Regional Reliability Organization at all times.

### D. Compliance

#### 1. Compliance Monitoring Process

##### 1.1. Compliance Monitoring Responsibility

Regional Reliability Organization.

##### 1.2. Compliance Monitoring Period and Reset Time Frame

The Regional Reliability Organization shall review and evaluate emergency plans every three years to ensure that the plans consider the applicable elements of Attachment 1-EOP-001-~~00b~~.

The Regional Reliability Organization may elect to request self-certification of the Transmission Operator and Balancing Authority in years that the full review is not done.

Reset: one calendar year.

##### 1.3. Data Retention

Current plan available at all times.

##### 1.4. Additional Compliance Information

Not specified.

2. Violation Severity Levels:

Requirement	Lower	Moderate	High	Severe
R1	The Balancing Authority failed to demonstrate the existence of the necessary operating agreements for less than 25% of the adjacent BAs. Or less than 25% of those agreements do not contain provisions for emergency assistance.	The Balancing Authority failed to demonstrate the existence of the necessary operating agreements for 25% to 50% of the adjacent BAs. Or 25 to 50% of those agreements do not contain provisions for emergency assistance.	The Balancing Authority failed to demonstrate the existence of the necessary operating agreements for 50% to 75% of the adjacent BAs. Or 50% to 75% of those agreements do not contain provisions for emergency assistance.	The Balancing Authority failed to demonstrate the existence of the necessary operating agreements for 75% or more of the adjacent BAs. Or more than 75% of those agreements do not contain provisions for emergency assistance.
R2	The Transmission Operator or Balancing Authority failed to comply with one (1) of the sub-components.	The Transmission Operator or Balancing Authority failed to comply with two (2) of the sub-components.	N/A	The Transmission Operator or Balancing Authority has failed to comply with three (3) of the sub-components.
R2.1	The Transmission Operator or Balancing Authority's emergency plans to mitigate insufficient generating capacity are missing minor details or minor program/procedural elements.	The Transmission Operator or Balancing Authority's has demonstrated the existence of emergency plans to mitigate insufficient generating capacity emergency plans but the plans are not maintained.	The Transmission Operator or Balancing Authority's emergency plans to mitigate insufficient generating capacity emergency plans are neither maintained nor implemented.	The Transmission Operator or Balancing Authority has failed to develop emergency mitigation plans for insufficient generating capacity.
R2.2	The Transmission Operator or Balancing Authority's plans to mitigate transmission system emergencies are missing minor details or minor program/procedural elements.	The Transmission Operator or Balancing Authority's has demonstrated the existence of transmission system emergency plans but are not maintained.	The Transmission Operator or Balancing Authority's transmission system emergency plans are neither maintained nor implemented.	The Transmission Operator or Balancing Authority has failed to develop, maintain, and implement operating emergency mitigation plans for emergencies on the transmission system.

Requirement	Lower	Moderate	High	Severe
R2.3	The Transmission Operator or Balancing Authority's load shedding plans are missing minor details or minor program/procedural elements.	The Transmission Operator or Balancing Authority's has demonstrated the existence of load shedding plans but are not maintained.	The Transmission Operator or Balancing Authority's load shedding plans are partially compliant with the requirement but are neither maintained nor implemented.	The Transmission Operator or Balancing Authority has failed to develop, maintain, and implement load shedding plans.
R3	The Transmission Operator or Balancing Authority failed to comply with one (1) of the sub-components.	The Transmission Operator or Balancing Authority failed to comply with two (2) of the sub-components.	The Transmission Operator or Balancing Authority has failed to comply with three (3) of the sub-components.	The Transmission Operator or Balancing Authority has failed to comply with all four (4) of the sub-components.
R3.1	The Transmission Operator or Balancing Authority's communication protocols included in the emergency plan are missing minor program/procedural elements.	N/A	N/A	The Transmission Operator or Balancing Authority has failed to include communication protocols in its emergency plans to mitigate operating emergencies.
R3.2	The Transmission Operator or Balancing Authority's list of controlling actions has resulted in meeting the intent of the requirement but is missing minor program/procedural elements.	N/A	The Transmission Operator or Balancing Authority provided a list of controlling actions, however the actions fail to resolve the emergency within NERC-established timelines.	The Transmission Operator or Balancing Authority has failed to provide a list of controlling actions to resolve the emergency.

Requirement	Lower	Moderate	High	Severe
R3.3	The Transmission Operator or Balancing Authority has demonstrated coordination with Transmission Operators and Balancing Authorities but is missing minor program/procedural elements.	N/A	N/A	The Transmission Operator or Balancing Authority has failed to demonstrate the tasks to be coordinated with adjacent Transmission Operator and Balancing Authorities as directed by the requirement.
R3.4	The Transmission Operator or Balancing Authority's emergency plan does not include staffing levels for the emergency	N/A	N/A	N/A
R4	The Transmission Operator and Balancing Authority's emergency plan has complied with 90% or more of the number of sub-components.	The Transmission Operator and Balancing Authority's emergency plan has complied with 70% to 90% of the number of sub-components.	The Transmission Operator and Balancing Authority's emergency plan has complied with between 50% to 70% of the number of sub-components.	The Transmission Operator and Balancing Authority's emergency plan has complied with 50% or less of the number of sub-components
R5	The Transmission Operator and Balancing Authority is missing minor program/procedural elements.	The Transmission Operator and Balancing Authority has failed to annually review one of it's emergency plans	The Transmission Operator and Balancing Authority has failed to annually review two of its emergency plans or communicate with one of it's neighboring Balancing Authorities.	The Transmission Operator and Balancing Authority has failed to annually review and/or communicate any emergency plans with its Reliability Coordinator, neighboring Transmission Operators or Balancing Authorities.
R6	The Transmission Operator and/or the Balancing Authority failed to comply with one (1) of the sub-components.	The Transmission Operator and/or the Balancing Authority failed to comply with two (2) of the sub-components.	The Transmission Operator and/or the Balancing Authority has failed to comply with three (3) of the sub-components.	The Transmission Operator and/or the Balancing Authority has failed to comply with four (4) or more of the sub-components.

Requirement	Lower	Moderate	High	Severe
R6.1	The Transmission Operator or Balancing Authority has failed to establish and maintain reliable communication between interconnected systems.	N/A	N/A	N/A
R6.2	The Transmission Operator or Balancing Authority has failed to arrange new interchange agreements to provide for emergency capacity or energy transfers with required entities when existing agreements could not be used.	N/A	N/A	N/A
R6.3	The Transmission Operator or Balancing Authority has failed to coordinate transmission and generator maintenance schedules to maximize capacity or conserve fuel in short supply.	N/A	N/A	N/A
R6.4	The Transmission Operator or Balancing Authority has failed to arrange for deliveries of electrical energy or fuel from remote systems through normal operating channels.	N/A	N/A	N/A

**E. Regional Differences**

None identified.

**Version History**

Version	Date	Action	Change Tracking
<u>0</u>	<u>February 8, 2005</u>	<u>Adopted by the Board of Trustees</u>	<u>New</u>
0	April 1, 2005	Effective Date	New
0	August 8, 2005	Removed “Proposed” from Effective Date	Errata
1	October 17, 2008	Deleted R2 Replaced Levels of Non-compliance with the February 28, 2008 BOT approved Violation Severity Levels Corrected typographical errors in BOT approved version of VSLs	Revised <u>IROL Project</u>
2	<del>To be determined</del> <u>August 5, 2009</u>	Removed R2.4 as redundant with EOP-005-2 Requirement R1 for the Transmission Operator; the Balancing Authority does not need a restoration plan.	<u>Revised</u> <u>Project 2006-03</u>
2	August <del>8</del> <u>5</u> , 2009	Adopted by NERC Board of Trustees: August 5, 2009	Revised
<u>2</u>	<u>March 17, 2011</u>	<u>FERC Order issued approving EOP-001-2 (Clarification issued on July 13, 2011)</u>	<u>Revised</u>
<u>2b</u>	<u>November 4, 2010</u>	<u>Adopted by NERC Board of Trustees</u>	<u>Project 2008-09 - Interpretation of Requirement R1</u>
<u>2b</u>	<u>November 4, 2010</u>	<u>Adopted by NERC Board of Trustees</u>	<u>Project 2009-28 - Interpretation of Requirement R2.2</u>

**Attachment 1-EOP-001-~~00b~~**

**Elements for Consideration in Development of Emergency Plans**

1. Fuel supply and inventory — An adequate fuel supply and inventory plan that recognizes reasonable delays or problems in the delivery or production of fuel.
2. Fuel switching — Fuel switching plans for units for which fuel supply shortages may occur, e.g., gas and light oil.
3. Environmental constraints — Plans to seek removal of environmental constraints for generating units and plants.
4. System energy use — The reduction of the system's own energy use to a minimum.
5. Public appeals — Appeals to the public through all media for voluntary load reductions and energy conservation including educational messages on how to accomplish such load reduction and conservation.
6. Load management — Implementation of load management and voltage reductions, if appropriate.
7. Optimize fuel supply — The operation of all generating sources to optimize the availability.
8. Appeals to customers to use alternate fuels — In a fuel emergency, appeals to large industrial and commercial customers to reduce non-essential energy use and maximize the use of customer-owned generation that rely on fuels other than the one in short supply.
9. Interruptible and curtailable loads — Use of interruptible and curtailable customer load to reduce capacity requirements or to conserve the fuel in short supply.
10. Maximizing generator output and availability — The operation of all generating sources to maximize output and availability. This should include plans to winterize units and plants during extreme cold weather.
11. Notifying IPPs — Notification of cogeneration and independent power producers to maximize output and availability.
12. Requests of government — Requests to appropriate government agencies to implement programs to achieve necessary energy reductions.
13. Load curtailment — A mandatory load curtailment plan to use as a last resort. This plan should address the needs of critical loads essential to the health, safety, and welfare of the community. Address firm load curtailment.
14. Notification of government agencies — Notification of appropriate government agencies as the various steps of the emergency plan are implemented.
15. Notifications to operating entities — Notifications to other operating entities as steps in emergency plan are implemented.

## Appendix 1

### Requirement Number and Text of Requirement

R1. Balancing Authorities shall have operating agreements with adjacent Balancing Authorities that shall, at a minimum, contain provisions for emergency assistance, including provisions to obtain emergency assistance from remote Balancing Authorities.

### Questions:

1. What is the definition of emergency assistance in the context of this standard? What scope and time horizons, if any, are considered necessary in this definition?
2. What was intended by using the adjective “adjacent” in Requirement 1? Does “adjacent Balancing Authorities” mean “All” or something else? Is there qualifying criteria to determine if a very small adjacent Balancing Authority area has enough capacity to offer emergency assistance?
3. What is the definition of the word “remote” as stated in the last phrase of Requirement 1? Does remote mean every Balancing Authority who’s area does not physically touch the Balancing Authority attempting to comply with this Requirement?
4. Would a Balancing Authority that participates in a Reserve Sharing Group Agreement, which meets the requirements of Reliability Standard BAL-002-0, Requirement 2, have to establish additional operating agreements to achieve compliance with Reliability Standard EOP-001-0, Requirement 1?

### Responses:

1. In the context of this standard, emergency assistance is emergency energy. Emergency energy would normally be arranged for during the current operating day. The agreement should describe the conditions under which the emergency energy will be delivered to the responsible Balancing Authority.
2. The intent is that all Balancing Authorities, interconnected by AC ties or DC (asynchronous) ties within the same Interconnection, have emergency energy assistance agreements with at least one Adjacent Balancing Authority and have sufficient emergency energy assistance agreements to mitigate reasonably anticipated energy emergencies. However, the standard does not require emergency energy assistance agreements with all Adjacent Balancing Authorities, nor does it preclude having an emergency assistance agreement across Interconnections.
3. A remote Balancing Authority is a Balancing Authority other than an Adjacent Balancing Authority. A Balancing Authority is not required to have arrangements in place to obtain emergency energy assistance with any remote Balancing Authorities. A Balancing Authority’s agreement(s) with Adjacent Balancing Authorities does (do) not preclude the Adjacent Balancing Authority from purchasing emergency energy from remote Balancing Authorities.
4. A Reserve Sharing Group agreement that contains provisions for emergency assistance may be used to meet Requirement R1 of EOP-001-0.



## Appendix 2

### Requirement Number and Text of Requirement

R2.2. Develop, maintain, and implement a set of plans to mitigate operating emergencies on the transmission system.

#### Questions:

Does the BA need to develop a plan to maintain a load-interchange-generation balance during operating emergencies and follow the directives of the TOP?

#### Questions:

The answer to both parts of the question is yes. The Balancing Authority is required by the standard to develop, maintain, and implement a plan. The plan must consider the relationships and coordination with the Transmission Operator for actions directly taken by the Balancing Authority. The Balancing Authority must take actions either as directed by the Transmission Operator or the Reliability Coordinator (reference TOP-001-1, Requirement R3), or as previously agreed to with the Transmission Operator or the Reliability Coordinator to mitigate transmission emergencies. As stated in Requirement R4, the emergency plan shall include the applicable elements in “Attachment 1 –EOP-001-0.”

**Exhibit D**

**Consideration of Comments for interpretations to Requirements R1 of EOP-001-0 — Emergency Operations Planning**

## Project 2008-09 RECM Request for Interpretation - EOP-001-0 - Emergency Operations Planning

### Related Files

**Status:**

Approved by the Board of Trustees on November 4, 2010.

**Purpose/Industry Need:**

In accordance with the Reliability Standards Development Procedure, the interpretation must be posted for a 30-day pre-ballot review, and then balloted. There is no public comment period for an interpretation. Balloting will be conducted following the same method used for balloting standards. If the interpretation is approved by its ballot pool, then the interpretation will be appended to the standard and will become effective when adopted by the NERC Board of Trustees and approved by the applicable regulatory authorities. The interpretation will remain appended to the standard until the standard is revised through the normal standards development process. When the standard is revised, the clarifications provided by the interpretation will be incorporated into the revised standard.

Draft	Action	Dates	Results	Consideration of Comments
Draft 4  RECM Interpretation for EOP-001-0  Clean	Recirculation Ballot  <a href="#">Info&gt;&gt;</a>   <a href="#">Vote&gt;&gt;</a>	10/04/10 - 10/14/10	<a href="#">Summary&gt;&gt;</a>  Full Record>>	
Revision 3 RECM Interpretation for EOP-001-0  <b>Revised Interpretation</b> Clean   Redline	Initial Ballot  <a href="#">Info&gt;&gt;</a>   <a href="#">Vote&gt;&gt;</a>	04/15/10 - 04/26/10 (closed)	<a href="#">Summary&gt;&gt;</a>  Full Record>>	Consideration of Comments <b>(4)</b>
	Pre-ballot Review  <a href="#">Info&gt;&gt;</a>   <a href="#">Join&gt;&gt;</a>	03/16/10 - 04/15/10 (closed)		
Revision 2  RECM Interpretation for EOP-001-0	Initial Ballot  <a href="#">Info&gt;&gt;</a>   <a href="#">Vote&gt;&gt;</a>	11/05/09 - 11/16/09 (closed)	<a href="#">Summary&gt;&gt;</a>  Ballot Results>>	Consideration of Comments <b>(3)</b>
Revised Interpretation Clean	Pre-ballot	10/06/09 -		

<a href="#">  Redline</a> Request for Interpretation	Review <a href="#">Info&gt;&gt;</a>   <a href="#">Join&gt;&gt;</a>	11/05/09 (closed)		
Revision 1 RECM Interpretation for EOP-001-0  Revised Interpretation Clean   <a href="#">Redline</a> Request for Interpretation	Initial Ballot <a href="#">Info&gt;&gt;</a>   <a href="#">Vote&gt;&gt;</a>	02/27/09 - 03/09/09 (closed)	<a href="#">Summary&gt;&gt;</a>  <a href="#">Ballot  Results&gt;&gt;</a>	Consideration of Comments <b>(2)</b>
	Pre-ballot Review <a href="#">Info&gt;&gt;</a>   <a href="#">Join&gt;&gt;</a>	01/28/09 – 02/26/09 (closed)		
RECM Interpretation for EOP-001-0	Recirculation Ballot  <a href="#">Info&gt;&gt;</a>  (Conducted in error Results are void)	01/06/09 - 01/15/09 (closed)		
RECM Interpretation for EOP-001-0  Interpretation Request for Interpretation	Ballot Window <a href="#">Info&gt;&gt;</a>   <a href="#">Vote&gt;&gt;</a>	06/19/08 – 07/02/08 (closed)	<a href="#">Summary&gt;&gt;</a>  <a href="#">Full  Record&gt;&gt;</a>	Consideration of Comments <b>(1)</b>
	Pre-ballot Review <a href="#">Info&gt;&gt;</a>   <a href="#">Join&gt;&gt;</a>	05/19/08 – 06/19/08 (closed)		

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## Consideration of Comments on Initial Ballot RECM Interpretation Request — EOP-001, R1

**Summary Consideration:** Some entities requested clarification for using dc voltages, the definition of adjacent regarding Balancing Authorities, and how much was “enough” energy emergency assistance. A few entities suggested increased requirements for emergency energy assistance and reserve sharing group participation. The drafting team modified the language in the interpretation to use the defined term Adjacent Balancing Authority and clarified that the requirement does not require energy assistance agreements with all Adjacent Balancing Authorities. The team will submit certain suggestions regarding requirements to the manager of standards development.

Segment	Entity	Ballot	Comments
1	Bonneville Power Administration	Affirmative	In Item 2, we recommend replacing "AC" with "AC and/or DC tie lines in the same interconnection" We strongly support the item 4 interpretation regarding reserve sharing groups.
<p><b>Response:</b> The drafting team agrees with your comment and proposes to use the NERC Glossary of Terms definition of Adjacent Balancing Authority, which doesn't limit interconnections to AC ties.</p>			
1	Consolidated Edison Co. of New York	Negative	DC ties should have been referenced and included in the interpretation, agreements with ALL adjacent BAs should be required. Specific Emergency Energy Agreements should either be explicit parts of the operating agreements or developed separately and in place as well. Also, participation in a Reserve Sharing Group may be insufficient to meet Requirement R1
<p><b>Response:</b> The drafting team agrees with your comment and proposes to use the NERC Glossary of Terms definition of Adjacent Balancing Authority, which doesn't limit interconnections to AC ties.</p> <p>The intent of the interpretation is to require energy assistance agreements with enough BAs to have sufficient emergency energy assistance agreements to mitigate reasonably anticipated energy emergencies. Having emergency energy assistance agreements with all BAs may exceed what is required to maintain an adequate level of reliability.</p> <p>The technical criteria for establishing what constitutes sufficient emergency assistance should be established through the Standards Development Process.</p>			
1	Duke Energy Carolina	Affirmative	Duke Energy appreciates the opportunity to comment on this Interpretation . Duke Energy supports the concepts in this Interpretation; however, there remain some issues that should be dealt within a Standards Authorization Request to revise the standard. In addition, using a general term such as "enough" still keeps the Balancing Authority in the position of a compliance team interpretation of "enough". Duke Energy believes that the Interpretation should clarify that in the context of this standard, emergency assistance is emergency energy. Emergency energy would normally be arranged for during the current operating day. The agreement should describe the conditions

**Consideration of Comments on Initial ballot RECM Interpretation Request — EOP-001, R1**

Segment	Entity	Ballot	Comments
			under which the emergency energy will be delivered to the responsible Balancing Authority. The intent of this standard is that all Balancing Authorities should have sufficient emergency assistance agreements in order to meet Control Performance Standards, Disturbance Control Standards and other applicable standards. Therefore emergency assistance agreements are not required with all adjacent Balancing Authorities. Such agreements may also be in place with remote Balancing Authorities, but are not required.
<b>Response:</b> The drafting team agrees with your comments and will submit them to the manager of standards development for inclusion in the Standards "Issues" database.			
1	FirstEnergy Energy Delivery	Affirmative	FirstEnergy supports the interpretation provided for EOP-001 Requirement R1 and believes it further clarifies Balancing Authority expectations related to emergency assistance agreements with other Balancing Authorities. It is expected that the standards drafting team working on Project 2008-03 will reference this interpretation when completing revisions to the EOP-001 standard to achieve greater clarity within the standard's requirements and measures. The only question we raise and seek clarification to is in regards to item #2 and we question why the interpretation excludes DC ties when defining an adjacent Balancing Authority? As written, would a Balancing Authority be precluded from obtaining emergency assistance from a BA with whom they may only have DC interconnection(s)? Or, is the intent that a DC tie is considered a remote Balancing Authority and covered by item #3?
<b>Response:</b> The drafting team agrees with your comment and proposes to use the NERC Glossary of Terms definition of Adjacent Balancing Authority, which doesn't limit interconnections to AC ties.			
1	National Grid	Negative	National Grid agrees with the comments made by NPCC and other NPCC members: EOP-001, R1 states "Balancing Authorities shall have operating agreements with adjacent Balancing Authorities that shall, at a minimum, contain provisions for emergency assistance, including provisions to obtain emergency assistance from remote Balancing Authorities. We feel that emergency assistance agreements should be made with ALL adjacent BAs which is contrary to the interpretation which states the intent is to have emergency agreements with at least one adjacent BA. Additionally, the interpretation states that "The responsible Balancing Authority is not required to have arrangements in place to obtain emergency energy assistance with all remote Balancing Authorities". We feel that emergency agreements with ALL adjacent BAs further needs to be in place in order for a BA to get remote assistance from a non-adjacent or through an adjacent BA. DC ties should have been referenced and included in the interpretation. The interpretation furthers states that a BA that is compliant with BAL-002 —" Disturbance Control Performance Requirement R2 through participation in a Reserve

**Consideration of Comments on Initial ballot RECM Interpretation Request — EOP-001, R1**

Segment	Entity	Ballot	Comments
			Sharing Group Agreement, is not required to establish additional operating agreements for EOP-001-0 Requirement R1. We feel that participation in a Reserve Sharing Group may be insufficient to meet Requirement 1.
<p><b>Response:</b> The drafting team agrees with your comment and proposes to use the NERC Glossary of Terms definition of Adjacent Balancing Authority, which doesn't limit interconnections to AC ties.</p>			
<p>The intent of the interpretation is to require energy assistance agreements with enough BAs to have sufficient emergency energy assistance agreements to mitigate reasonably anticipated energy emergencies. Having emergency energy assistance agreements with all BAs may exceed what is required to maintain an adequate level of reliability.</p>			
<p>The technical criteria for establishing what constitutes sufficient emergency assistance should be established through the Standards Development Process.</p>			
1	New Brunswick Power Transmission Corporation	Negative	DC ties should have been referenced and included in the interpretation, agreements with ALL adjacent BAs should be required. Specific Emergency Energy Agreements should either be explicit parts of the operating agreements or developed separately and in place as well. Also, participation in a Reserve Sharing Group may be insufficient to meet Requirement R1.
<p><b>Response:</b> The intent of the interpretation is to require energy assistance agreements with enough BAs to have sufficient emergency energy assistance agreements to mitigate reasonably anticipated energy emergencies. Having emergency energy assistance agreements with all BAs may exceed what is required to maintain an adequate level of reliability.</p>			
<p>The technical criteria for establishing what constitutes sufficient emergency assistance should be established through the Standards Development Process.</p>			
1	New York Power Authority	Negative	DC ties should have been referenced and included in the interpretation, agreements with ALL adjacent BAs should be required. Specific Emergency Energy Agreements should either be explicit parts of the operating agreements or developed separately and in place as well. Also, participation in a Reserve Sharing Group may be insufficient to meet Requirement R1.
<p><b>Response:</b> The drafting team agrees with your comment and proposes to use the NERC Glossary of Terms definition of Adjacent Balancing Authority, which doesn't limit interconnections to AC ties.</p>			
<p>The intent of the interpretation is to require energy assistance agreements with enough BAs to have sufficient emergency energy assistance agreements to mitigate reasonably anticipated energy emergencies. Having emergency energy assistance agreements with all BAs may exceed what is required to maintain an adequate level of reliability.</p>			
<p>The technical criteria for establishing what constitutes sufficient emergency assistance should be established through the Standards Development Process.</p>			
1	Northeast Utilities	Negative	DC ties should be referenced and included in the interpretation. Agreements with ALL adjacent BAs should be required. Specific Emergency Energy Agreements should either be explicit parts of the operating agreements, or developed separately and in place as well.
<p><b>Response:</b> The drafting team agrees with your comment and proposes to use the NERC Glossary of Terms definition of Adjacent Balancing Authority, which</p>			

**Consideration of Comments on Initial ballot RECM Interpretation Request — EOP-001, R1**

Segment	Entity	Ballot	Comments
<p>doesn't limit interconnections to AC ties.</p> <p>The intent of the interpretation is to require energy assistance agreements with enough BAs to have sufficient emergency energy assistance agreements to mitigate reasonably anticipated energy emergencies. Having emergency energy assistance agreements with all BAs may exceed what is required to maintain an adequate level of reliability.</p>			
2	Independent Electricity System Operator	Negative	<p>While the IESO agrees with various aspects of the clarification provided, which we believe helpful, we nonetheless disagree with a number of the clarifications we deem significantly flawed for reasons noted below and must vote NO to the interpretations:</p> <p>1. The interpretation offered indicated that being part of a RSG is sufficient to meet the obligation of this requirement — we do not agree with this position. Two BAs may engage in a reserve sharing agreement that is designed to offset reserve requirements or to provide support for DCS recover from an incident. However, if the operating agreement does not explicitly address energy assistance under emergency conditions, and the scope and condition of the emergency, emergency energy may not flow. Additionally, reserve sharing agreement addresses the amount of reserve that each participating member needs to carry to meet the overall group and/or individual BAs reserve requirements. Situation can exist that while the shared reserve is used up and a BA is still short of resource, and additional energy delivery is required to take care of the emergency. 2. The SDT indicated that it is OK not to have emergency energy assistance agreements with all adjacent BAs — this is contrary to the NPCC position which dictates that an entity (the responsible BA) must have emergency energy assistance agreements with all adjacent BA entities — this could be either as part of the operating agreement or as a separate explicit agreement by itself. 3. Further, the interpretation precludes adjacent BAs which are connected with only DC ties. It is IESO view that provision of emergency assistance should also be available from areas that are interconnected by DC ties.</p>
<p><b>Response:</b> The drafting team agrees with your comment and proposes to use the NERC Glossary of Terms definition of Adjacent Balancing Authority, which doesn't limit interconnections to AC ties.</p> <p>The intent of the interpretation is to require energy assistance agreements with enough BAs to have sufficient emergency energy assistance agreements to mitigate reasonably anticipated energy emergencies. Having emergency energy assistance agreements with all BAs may exceed what is required to maintain an adequate level of reliability.</p> <p>The technical criteria for establishing what constitutes sufficient emergency assistance should be established through the Standards Development Process.</p>			
2	ISO New England, Inc.	Negative	DC ties should be included in the interpretation, not just AC ties. Agreements with ALL adjacent BAs should be required. Specific Emergency Energy



## Consideration of Comments on Initial ballot RECM Interpretation Request — EOP-001, R1

Segment	Entity	Ballot	Comments
			Agreements should either be explicit parts of the operating agreements or developed separately and in place as well. Participation in a Reserve Sharing Group may be insufficient to meet Requirement R1 unless such agreement explicitly contains Emergency Energy Agreements among parties.
<p><b>Response:</b> The drafting team agrees with your comment and proposes to use the NERC Glossary of Terms definition of Adjacent Balancing Authority, which doesn't limit interconnections to AC ties.</p> <p>The intent of the interpretation is to require energy assistance agreements with enough BAs to have sufficient emergency energy assistance agreements to mitigate reasonably anticipated energy emergencies. Having emergency energy assistance agreements with all BAs may exceed what is required to maintain an adequate level of reliability.</p> <p>The technical criteria for establishing what constitutes sufficient emergency assistance should be established through the Standards Development Process.</p>			
3	Bonneville Power Administration	Affirmative	Related to the Subcommittee's recommended interpretation #2 BPA suggests the following language changes: An adjacent Balancing Authority is one that has AC and/or DC tie lines in the same interconnection with the responsible BA. We like the interpretation #4 and do want to see it changed.
<p><b>Response:</b> The drafting team agrees with your comment and proposes to use the NERC Glossary of Terms definition of Adjacent Balancing Authority, which doesn't limit interconnections to AC ties.</p>			
3	Consolidated Edison Co. of New York	Negative	DC ties should have been referenced and included in the interpretation, agreements with ALL adjacent BAs should be required. Specific Emergency Energy Agreements should either be explicit parts of the operating agreements or developed separately and in place as well. Also, participation in a Reserve Sharing Group may be insufficient to meet Requirement R1"
<p><b>Response:</b> The drafting team agrees with your comment and proposes to use the NERC Glossary of Terms definition of Adjacent Balancing Authority, which doesn't limit interconnections to AC ties.</p> <p>The intent of the interpretation is to require energy assistance agreements with enough BAs to have sufficient emergency energy assistance agreements to mitigate reasonably anticipated energy emergencies. Having emergency energy assistance agreements with all BAs may exceed what is required to maintain an adequate level of reliability.</p> <p>The technical criteria for establishing what constitutes sufficient emergency assistance should be established through the Standards Development Process.</p>			
3	Consumers Energy	Affirmative	We agree with the intent of the interpretation to Question 4, but suggest it would be unequivocally clear to state: "A Balancing Authority that is compliant with Reliability Standard BAL-002-0, Requirement R2 through participation in a Reserve Sharing Group Agreement shall be deemed to be fully compliant with Requirement R1 of EOP-001-1."
<p><b>Response:</b> Your comment will be submitted to the manager of standards development for inclusion in the Standards "Issues" database as a potential modification to the associated standard.</p>			
3	FirstEnergy Solutions	Affirmative	"FirstEnergy supports the interpretation provided for EOP-001 Requirement R1

**Consideration of Comments on Initial ballot RECM Interpretation Request — EOP-001, R1**

Segment	Entity	Ballot	Comments
			and believes it further clarifies Balancing Authority expectations related to emergency assistance agreements with other Balancing Authorities. It is expected that the standards drafting team working on Project 2008-03 will reference this interpretation when completing revisions to the EOP-001 standard to achieve greater clarity within the standard's requirements and measures. The only question we raise and seek clarification to is in regards to item #2 and we question why the interpretation excludes DC ties when defining an adjacent Balancing Authority? As written, would a Balancing Authority be precluded from obtaining emergency assistance from a BA with whom they may only have DC interconnection(s)? Or, is the intent that a DC tie is considered a remote Balancing Authority and covered by item #3? "
<b>Response:</b> The drafting team agrees with your comment and proposes to use the NERC Glossary of Terms definition of Adjacent Balancing Authority, which doesn't limit interconnections to AC ties.			
3	Hydro One Networks, Inc.	Negative	Hydro One Networks Inc. casts a Negative vote with the following comments: 1. DC ties should have been referenced and included in the interpretation. 2. Agreements with ALL adjacent BAs should be required. 3. Specific Emergency Energy Agreements should either be explicit parts of the operating agreements or developed separately and in place as well. 4. Participation in a Reserve Sharing Group may be insufficient to meet Requirement R1.
<b>Response:</b> The drafting team agrees with your comment and proposes to use the NERC Glossary of Terms definition of Adjacent Balancing Authority, which doesn't limit interconnections to AC ties.			
The intent of the interpretation is to require energy assistance agreements with enough BAs to have sufficient emergency energy assistance agreements to mitigate reasonably anticipated energy emergencies. Having emergency energy assistance agreements with all BAs may exceed what is required to maintain an adequate level of reliability.			
The technical criteria for establishing what constitutes sufficient emergency assistance should be established through the Standards Development Process.			
3	Louisville Gas and Electric Co.	Affirmative	E.ON US votes YES and wishes to emphasize in our comments the value and importance of Reserve Sharing Groups (RSGs) to first and foremost ensure, reliability on a real-time basis, and also to lower the cost of providing electrical power to our customers. Due to this value, NERC and the Industry should support, encourage and seek expansion of RSGs. Our specific points are as follows. The reliability benefits to the parties of RSGs are: <ul style="list-style-type: none"> <li>- The parties have access to the Contingency Reserve generation capacity of all members on a real time basis and have certainty of emergency energy supply.</li> <li>- The parties utilize a computerized process that immediately dispatches generation and spinning reserves and ten-minute quick-start Contingency Reserves when called upon by a party with a</li> </ul>

Consideration of Comments on Initial ballot RECM Interpretation Request — EOP-001, R1

Segment	Entity	Ballot	Comments
			<p>sudden loss of supply</p> <ul style="list-style-type: none"> <li>- resulting in an immediate response to the supply loss.</li> <li>- The diversity and large number of generating units quickly ramping up to provide emergency power further ensure certainty and an immediate response to the supply loss.</li> <li>- The parties coordinate in advance TRM to ensure that emergency energy for Contingency Reserves can flow in real-time when called on, resulting in certainty of transmission for the flow of emergency energy. The lower cost benefits to the end user customers of the parties of RSGs are:</li> </ul> <ul style="list-style-type: none"> <li>- More efficient use of supply due to reduced Operating Reserves for each BA, despite the size of each BA, in RSGs. (The Midwest ISO has stated that they have conducted studies that have demonstrated that each MW of spinning reserve has a value of \$350,000. Thus, the 300 MW of spinning reserves to be provided at the start of the ASM to the Midwest ISO load by MCRSG parties external to the Midwest ISO footprint equate to approximately \$100 million in annual value. This value will become an annual cost to the Midwest ISO load upon sunset of the MCRSG. This does not include the savings of similar nature to the external BAs.)</li> <li>- The flexibility to transact more energy between BAs with freed-up generation and transmission capacity is achieved even if the Midwest BA grows and the External CRSG BAs decrease to only a few parties.</li> <li>- The advance coordination of TRM reduces the amount of TRM needed. Due to these points, RSGs among BAs, including BAs which are large ISOs operating day ahead and real-time markets along with Operating Reserve markets, should be encouraged. Also, E.ON US</li> <li>- YES vote supports the NERC interpretation that Emergency Assist agreements (EAAs) between interconnected BAs are not required between every interconnect BA to meet NERC Standards. Since the nature of EAAs is for a BA to provide emergency power to a BA, with a supply emergency, immediately or in the near term future (next hour, day or week), E.ON US suggest that NERC should encourage all BAs to file unilateral EAAs at the appropriate rate, MBR or CBR where applicable. Such unilateral filings would establish agreements and rates to provide non-firm emergency power if available after BAs and their associated LSEs have ensured adequate supply to native load and firm transactions (Designated Network Load).</li> </ul>

**Consideration of Comments on Initial ballot RECM Interpretation Request — EOP-001, R1**

Segment	Entity	Ballot	Comments
<b>Response:</b> Your comments will be submitted to the manager of standards development.			
3	New York Power Authority	Negative	DC ties should have been referenced and included in the interpretation agreements with ALL adjacent BAs should be required. Specific Emergency Energy Agreements should either be explicit parts of the operating agreements or developed separately and in place as well. Also, participation in a Reserve Sharing Group may be insufficient to meet Requirement R1.
<p><b>Response:</b> The drafting team agrees with your comment and proposes to use the NERC Glossary of Terms definition of Adjacent Balancing Authority, which doesn't limit interconnections to AC ties.</p> <p>The intent of the interpretation is to require energy assistance agreements with enough BAs to have sufficient emergency energy assistance agreements to mitigate reasonably anticipated energy emergencies. Having emergency energy assistance agreements with all BAs may exceed what is required to maintain an adequate level of reliability.</p> <p>The technical criteria for establishing what constitutes sufficient emergency assistance should be established through the Standards Development Process.</p>			
3	Niagara Mohawk (National Grid Company)	Negative	DC ties should have been referenced and included in the interpretation agreements with ALL adjacent BAs should be required. Specific Emergency Energy Agreements should either be explicit parts of the operating agreements or developed separately and in place as well. Also, participation in a Reserve Sharing Group may be insufficient to meet Requirement R1.
<p><b>Response:</b> The drafting team agrees with your comment and proposes to use the NERC Glossary of Terms definition of Adjacent Balancing Authority, which doesn't limit interconnections to AC ties.</p> <p>The intent of the interpretation is to require energy assistance agreements with enough BAs to have sufficient emergency energy assistance agreements to mitigate reasonably anticipated energy emergencies. Having emergency energy assistance agreements with all BAs may exceed what is required to maintain an adequate level of reliability.</p> <p>The technical criteria for establishing what constitutes sufficient emergency assistance should be established through the Standards Development Process.</p>			
4	Consumers Energy	Affirmative	We agree with the intent of the interpretation to Question 4, but suggest it would be unequivocally clear to state: "A Balancing Authority that is compliant with Reliability Standard BAL-002-0, Requirement R2 through participation in a Reserve Sharing Group Agreement shall be deemed to be fully compliant with Requirement R1 of EOP-001-1."
<b>Response:</b> Your comment will be submitted to the manager of standards development for inclusion in the Standards "Issues" database as a potential modification to the associated standard.			
5	Bonneville Power Administration	Affirmative	BPA agrees in principle with the interpretation with a couple of comments. - With regards to number 2; BPA would recommend the inclusion DC ties and suggests the following language changes: "An adjacent Balancing Authority is one that has AC or DC tie lines in the same interconnection with the responsible BA" This would allow for the inclusion of the Pacific DC intertie

Consideration of Comments on Initial ballot RECM Interpretation Request — EOP-001, R1

Segment	Entity	Ballot	Comments
			between BPA and LADWP. - BPA fully supports interpretation 4. with regards to reserve sharing groups.
<p><b>Response:</b> The drafting team agrees with your comment and proposes to use the NERC Glossary of Terms definition of Adjacent Balancing Authority, which doesn't limit interconnections to AC ties.</p>			
5	Louisville Gas and Electric Co.	Affirmative	<p>E.ON US votes YES and wishes to emphasize in our comments the value and importance of Reserve Sharing Groups (RSGs) to first and foremost ensure, reliability on a real-time basis, and also to lower the cost of providing electrical power to our customers. Due to this value, NERC and the Industry should support, encourage and seek expansion of RSGs. Our specific points are as follows. The reliability benefits to the parties of RSGs are:</p> <ul style="list-style-type: none"> <li>- The parties have access to the Contingency Reserve generation capacity of all members on a real time basis and have certainty of emergency energy supply.</li> <li>- The parties utilize a computerized process that immediately dispatches generation and spinning reserves and ten-minute quick-start Contingency Reserves when called upon by a party with a sudden loss of supply resulting in an immediate response to the supply loss.</li> <li>- The diversity and large number of generating units quickly ramping up to provide emergency power further ensure certainty and an immediate response to the supply loss.</li> <li>- The parties coordinate in advance TRM to ensure that emergency energy for Contingency Reserves can flow in real-time when called on, resulting in certainty of transmission for the flow of emergency energy. The lower cost benefits to the end user customers of the parties of RSGs are:</li> <li>- More efficient use of supply due to reduced Operating Reserves for each BA, despite the size of each BA, in RSGs. (The Midwest ISO has stated that they have conducted studies that have demonstrated that each MW of spinning reserve has a value of \$350,000. Thus, the 300 MW of spinning reserves to be provided at the start of the ASM to the Midwest ISO load by MCRSG parties external to the Midwest ISO footprint equate to approximately \$100 million in annual value. This value will become an annual cost to the Midwest ISO load upon sunset of the MCRSG. This does not include the savings of similar nature to the external BAs.)</li> <li>- The flexibility to transact more energy between BAs with freed-up generation and transmission capacity is achieved even if the Midwest BA grows and the External CRSG BAs decrease to only a few parties.</li> </ul>

Consideration of Comments on Initial ballot RECM Interpretation Request — EOP-001, R1

Segment	Entity	Ballot	Comments
			<ul style="list-style-type: none"> <li>– The advance coordination of TRM reduces the amount of TRM needed. Due to these points, RSGs among BAs, including BAs which are large ISOs operating day ahead and real-time markets along with Operating Reserve markets, should be encouraged. Also, E.ON US</li> <li>– YES vote supports the NERC interpretation that Emergency Assist agreements (EAAs) between interconnected BAs are not required between every interconnect BA to meet NERC Standards. Since the nature of EAAs is for a BA to provide emergency power to a BA, with a supply emergency, immediately or in the near term future (next hour, day or week), E.ON US suggest that NERC should encourage all BAs to file unilateral EAAs at the appropriate rate, MBR or CBR where applicable. Such unilateral filings would establish agreements and rates to provide non-firm emergency power if available after BAs and their associated LSEs have ensured adequate supply to native load and firm transactions (Designated Network Load).</li> </ul>
<p><b>Response:</b> Your comments will be submitted to the manager of standards development.</p>			
6	Bonneville Power Administration	Affirmative	In Item 2, we recommend replacing "AC" with "AC and/or DC tie lines in the same interconnection. "We strongly support the item 4 interpretation regarding reserve sharing groups.
<p><b>Response:</b> The drafting team agrees with your comment and proposes to use the NERC Glossary of Terms definition of Adjacent Balancing Authority, which doesn't limit interconnections to AC ties.</p>			
6	Consolidated Edison Co. of New York	Negative	DC ties should have been referenced and included in the interpretation, agreements with ALL adjacent BAs should be required. Specific Emergency Energy Agreements should either be explicit parts of the operating agreements or developed separately and in place as well. Also, participation in a Reserve Sharing Group may be insufficient to meet Requirement R1.
<p><b>Response:</b> The drafting team agrees with your comment and proposes to use the NERC Glossary of Terms definition of Adjacent Balancing Authority, which doesn't limit interconnections to AC ties.</p>			
<p>The intent of the interpretation is to require energy assistance agreements with enough BAs to have sufficient emergency energy assistance agreements to mitigate reasonably anticipated energy emergencies. Having emergency energy assistance agreements with all BAs may exceed what is required to maintain an adequate level of reliability.</p>			
<p>The technical criteria for establishing what constitutes sufficient emergency assistance should be established through the Standards Development Process.</p>			
6	Entergy Services, Inc.	Affirmative	While we agree with the interpretation, we believe there are some items to consider for clarification if this interpretation must go back for recirculation or re-balloting: Question 1 interpretation: the interpretation should address both a Capacity Emergency and Energy Emergency, as defined in the NERC Glossary. Further clarification to explain that emergency assistance is

**Consideration of Comments on Initial ballot RECM Interpretation Request — EOP-001, R1**

Segment	Entity	Ballot	Comments
			<p>applicable to both situations (capacity, energy or both) will minimize any confusion in the requirement and interpretation. (note —“ there appears to be little, if any difference in the definition of the terms; further clarification of the terms or eliminating one of the terms/consolidating the terms this would be an area for improvement in the NERC Standards) Question 2 interpretation: the interpretation should use the approved term from the NERC Glossary: Adjacent Balancing Authority Question 3 interpretation: the term “emergency assistance, as defined in Question 1 should be used in lieu of “emergency energy assistance,” or alternatively use the NERC Glossary terms Capacity Emergency and Energy Emergency Question 4 interpretation: the interpretation should specify that RSG agreements may be used if they contain provisions for use during a Capacity Emergency or Energy Emergency</p>
<p><b>Response:</b> Your comments will be submitted to the manager of standards development for inclusion in the Standards “Issues” database as a potential modification to the associated standard.</p>			
6	FirstEnergy Solutions	Affirmative	<p>FirstEnergy supports the interpretation provided for EOP-001 Requirement R1 and believes it further clarifies Balancing Authority expectations related to emergency assistance agreements with other Balancing Authorities. It is expected that the standards drafting team working on Project 2008-03 will reference this interpretation when completing revisions to the EOP-001 standard to achieve greater clarity within the standard's requirements and measures. The only question we raise and seek clarification to is in regards to item #2 and we question why the interpretation excludes DC ties when defining an adjacent Balancing Authority? As written, would a Balancing Authority be precluded from obtaining emergency assistance from a BA with whom they may only have DC interconnection(s)? Or, is the intent that a DC tie is considered a remote Balancing Authority and covered by item #3?</p>
<p><b>Response:</b> The drafting team agrees with your comment and proposes to use the NERC Glossary of Terms definition of Adjacent Balancing Authority, which doesn't limit interconnections to AC ties.</p>			
6	Louisville Gas and Electric Co.	Affirmative	<p>E.ON US votes YES and wishes to emphasize in our comments the value and importance of Reserve Sharing Groups (RSGs) to first and foremost ensure, reliability on a real-time basis, and also to lower the cost of providing electrical power to our customers. Due to this value, NERC and the Industry should support, encourage and seek expansion of RSGs. Our specific points are as follows. The reliability benefits to the parties of RSGs are:</p> <ul style="list-style-type: none"> <li>– The parties have access to the Contingency Reserve generation capacity of all members on a real time basis and have certainty of emergency energy supply.</li> <li>– The parties utilize a computerized process that immediately dispatches generation and spinning reserves and ten-minute quick-</li> </ul>

Consideration of Comments on Initial ballot RECM Interpretation Request — EOP-001, R1

Segment	Entity	Ballot	Comments
			<p>start Contingency Reserves when called upon by a party with a sudden loss of supply resulting in an immediate response to the supply loss.</p> <ul style="list-style-type: none"> <li>- The diversity and large number of generating units quickly ramping up to provide emergency power further ensure certainty and an immediate response to the supply loss.</li> <li>- The parties coordinate in advance TRM to ensure that emergency energy for Contingency Reserves can flow in real-time when called on, resulting in certainty of transmission for the flow of emergency energy. The lower cost benefits to the end user customers of the parties of RSGs are:</li> <li>- More efficient use of supply due to reduced Operating Reserves for each BA, despite the size of each BA, in RSGs. (The Midwest ISO has stated that they have conducted studies that have demonstrated that each MW of spinning reserve has a value of \$350,000. Thus, the 300 MW of spinning reserves to be provided at the start of the ASM to the Midwest ISO load by MCRSG parties external to the Midwest ISO footprint equate to approximately \$100 million in annual value. This value will become an annual cost to the Midwest ISO load upon sunset of the MCRSG. This does not include the savings of similar nature to the external BAs.)</li> <li>- The flexibility to transact more energy between BAs with freed-up generation and transmission capacity is achieved even if the Midwest BA grows and the External CRSG BAs decrease to only a few parties.</li> <li>- The advance coordination of TRM reduces the amount of TRM needed.</li> </ul>
<p><b>Response:</b> Your comments will be submitted to the manager of standards development.</p>			
9	Commonwealth of Massachusetts Department of Public Utilities	Negative	<p>Interpreters should:</p> <ol style="list-style-type: none"> <li>1) reconsider inclusion of BAs with DC ties, or explain why BAs with DC ties should be excluded;</li> <li>2) specify that Reserve Sharing Agreements have provisions addressing emergency assistance and that there be a demonstration that the Reserve Sharing Agreement is sufficient to mitigate reasonably anticipated energy emergencies; and,</li> <li>3) reconsider requiring that BAs have agreements with all adjacent BAs or explain why an agreement with one adjacent BA is sufficient under the Requirement 1 language.</li> </ol>
<p><b>Response:</b> The drafting team agrees with your comment and proposes to use the NERC Glossary of Terms definition of Adjacent Balancing Authority, which doesn't limit interconnections to AC ties.</p>			



**Consideration of Comments on Initial ballot RECM Interpretation Request — EOP-001, R1**

Segment	Entity	Ballot	Comments
<p>The intent of the interpretation is to require energy assistance agreements with enough BAs to have sufficient emergency energy assistance agreements to mitigate reasonably anticipated energy emergencies. Having emergency energy assistance agreements with all BAs may exceed what is required to maintain an adequate level of reliability.</p>			
<p>The technical criteria for establishing what constitutes sufficient emergency assistance should be established through the Standards Development Process.</p>			
9	National Association of Regulatory Utility Commissioners	Negative	<p>Interpreters should: 1) reconsider inclusion of BAs with DC ties, or explain why BAs with DC ties should be excluded; 2) specify that Reserve Sharing Agreements have provisions addressing emergency assistance and that there be a demonstration that the Reserve Sharing Agreement is sufficient to mitigate reasonably anticipated energy emergencies; and, 3) reconsider requiring that BAs have agreements with all adjacent BAs or explain why an agreement with one adjacent BA is sufficient under the Requirement 1 language.</p>
<p><b>Response:</b> The drafting team agrees with your comment and proposes to use the NERC Glossary of Terms definition of Adjacent Balancing Authority, which doesn't limit interconnections to AC ties.</p>			
<p>The intent of the interpretation is to require energy assistance agreements with enough BAs to have sufficient emergency energy assistance agreements to mitigate reasonably anticipated energy emergencies. Having emergency energy assistance agreements with all BAs may exceed what is required to maintain an adequate level of reliability.</p>			
<p>The technical criteria for establishing what constitutes sufficient emergency assistance should be established through the Standards Development Process.</p>			
10	Northeast Power Coordinating Council, Inc.	Negative	<p>DC tie lines should have been included in the interpretation. Agreements with all adjacent BAs should be required. Participation in a Reserve Sharing Group is insufficient to meet Requirement R1, unless the Reserve Sharing Group agreement contains emergency assistance provisions.</p>
<p><b>Response:</b> The drafting team agrees with your comment and proposes to use the NERC Glossary of Terms definition of Adjacent Balancing Authority, which doesn't limit interconnections to AC ties.</p>			
<p>The intent of the interpretation is to require energy assistance agreements with enough BAs to have sufficient emergency energy assistance agreements to mitigate reasonably anticipated energy emergencies. Having emergency energy assistance agreements with all BAs may exceed what is required to maintain an adequate level of reliability.</p>			
<p>The technical criteria for establishing what constitutes sufficient emergency assistance should be established through the Standards Development Process.</p>			

## Consideration of Comments on Initial Ballot for the Revised Interpretation of EOP-001-0 Requirement R1 for the Regional Entity Compliance Managers (Project 2008-09)

Ballot conducted from February 27 to March 9, 2009

### Summary Consideration:

There were three primary areas of concern expressed by balloters who submitted a negative vote:

1. EOP-001-0 should be applied on an Interconnection basis. Therefore, balloters recommended modifying paragraph 2 of the interpretation by inserting the phrase “interconnected by AC ties or DC (asynchronous) ties within the same Interconnection.” The Operating Reliability Subcommittee Executive Committee (ORS EC), which is serving as the drafting team for the interpretation, agrees with these balloters and proposes to modify paragraph 2 accordingly.
2. Several balloters questioned the use of the word “all” in the second sentence paragraph 3 of the interpretation. Use of the word all in this context implied to balloters that “at least one” was required. The ORS EC agrees with balloters and proposes to modify the interpretation by changing the word “all” to “any” in the second sentence of paragraph 3.
3. Several balloters questioned whether a Reserve Sharing Group agreement could substitute for an emergency assistance agreement with adjacent Balancing Authorities. Without an emergency assistance agreement, the conditions under which emergency energy assistance could be provided will remain undefined. The ORS EC agrees with balloters and proposes to modify paragraph 4 of the interpretation to read, “A Reserve Sharing Group agreement that contains provisions for emergency assistance may be used to meet Requirement R1 of EOP-001-0.”

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, Gerry Adamski, at 609-452-8060 or at [gerry.adamski@nerc.net](mailto:gerry.adamski@nerc.net). In addition, there is a NERC Reliability Standards Appeals Process.<sup>1</sup>

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<sup>1</sup> The appeals process is in the Reliability Standards Development Procedure: [http://www.nerc.com/files/RSDP\\_V6\\_1\\_12Mar07.pdf](http://www.nerc.com/files/RSDP_V6_1_12Mar07.pdf).

Voter	Entity	Segment	Vote	Comment
Stanley M Jaskot	Entergy Corporation	5	Negative	<p>1. We believe this standard should be applied on an Interconnection basis. Therefore, we recommend Item #2 be revised to "The intent is that all Balancing Authorities, interconnected by AC ties or DC (asynchronous) ties within the same Interconnection, have emergency ..." 2. We also recommend the "responsible Balancing Authority" be revised to "deficient Balancing Authority" in Item #3. Item # 3. A remote Balancing Authority is a Balancing Authority other than an Adjacent Balancing Authority. The responsible DEFICIENT Balancing Authority is not required to have arrangements in place to obtain emergency energy assistance with all remote Balancing Authorities. The responsible DEFICIENT Balancing Authority's agreement(s) with the Adjacent Balancing Authorities does (do) not preclude the Adjacent Balancing Authority from purchasing emergency energy from remote Balancing Authorities on behalf of the responsible DEFICIENT Balancing Authority. 3. We agree with the clarification that BAs are not required to have agreements with ALL Adjacent BAs.</p>
<p><b>Response:</b> Comment 1 – The Operating Reliability Subcommittee Executive Committee (ORS EC) agrees with the balloter and will insert the phrase “interconnected by AC ties or DC (asynchronous) ties within the same Interconnection” in the first sentence of paragraph 2. Comment 2 – The ORS EC agrees to eliminate the term “responsible” from the second, third, and forth sentences of paragraph 3. The ORS EC does not agree to insertion of the term “deficient.” EOP-001-0 is applicable to all Balancing Authorities. In addition, the ORS EC proposes to reword the last sentence of paragraph 3 to eliminate “on behalf of the responsible BA.” Comment 3 - The ORS EC agrees with the balloter; however, in response to other balloters, the ORS EC proposes to modify the interpretation by changing the word “all” to “any” in paragraph 3.</p>				
Paul Rocha	CenterPoint Energy	1	Negative	<p>CenterPoint Energy recommends further clarification of the terms "adjacent" and "neighboring" to address that such terms are not applicable to interconnection-wide regions, such as WECC and ERCOT. The proposed definition failed to explain the term "adjacent" as requested.</p>
<p><b>Response:</b> The ORS EC agrees with the balloter and will insert the phrase “interconnected by AC ties or DC (asynchronous) ties within the same Interconnection” in the first sentence of paragraph 2 of the interpretation.</p>				

Voter	Entity	Segment	Vote	Comment
Robert Martinko	FirstEnergy Energy Delivery	1	Affirmative	FirstEnergy supports the interpretation provided for EOP-001 Requirement R1 and believes it further clarifies Balancing Authority expectations related to emergency assistance agreements with other Balancing Authorities. It is expected that the standards drafting team that will work on Project 2009-03 will incorporate this interpretation when completing revisions to the EOP-001 standard to achieve greater clarity within the standard's requirements and measures.
Joanne Kathleen Borrell	FirstEnergy Solutions	3	Affirmative	FirstEnergy supports the interpretation provided for EOP-001 Requirement R1 and believes it further clarifies Balancing Authority expectations related to emergency assistance agreements with other Balancing Authorities. It is expected that the standards drafting team that will work on Project 2009-03 will incorporate this interpretation when completing revisions to the EOP-001 standard to achieve greater clarity within the standard's requirements and measures.
Douglas Hohlbaugh	Ohio Edison Company	4	Affirmative	FirstEnergy supports the interpretation provided for EOP-001 Requirement R1 and believes it further clarifies Balancing Authority expectations related to emergency assistance agreements with other Balancing Authorities. It is expected that the standards drafting team that will work on Project 2009-03 will incorporate this interpretation when completing revisions to the EOP-001 standard to achieve greater clarity within the standard's requirements and measures.
Kenneth Dresner	FirstEnergy Solutions	5	Affirmative	FirstEnergy supports the interpretation provided for EOP-001 Requirement R1 and believes it further clarifies Balancing Authority expectations related to emergency assistance agreements with other Balancing Authorities. It is expected that the standards drafting team that will work on Project 2009-03 will incorporate this interpretation when completing revisions to the EOP-001 standard to achieve greater clarity within the standard's requirements and measures.
Mark S Travaglianti	FirstEnergy Solutions	6	Affirmative	FirstEnergy supports the interpretation provided for EOP-001 Requirement R1 and believes it further clarifies Balancing Authority expectations related to emergency assistance agreements with other Balancing Authorities. It is expected that the standards drafting team that will work on Project 2009-03 will incorporate this interpretation when completing revisions to the EOP-001 standard to achieve greater clarity within the standard's requirements and measures.
<b>Response:</b> The ORS EC agrees with the balloters.				

Voter	Entity	Segment	Vote	Comment
Roy D. McCoy	Electric Reliability Council of Texas, Inc.	2	Negative	Interpretation should clarify what "adjacent" and "neighboring" means. Does it mean that EOP-001 applies to registered functional entities with AC ties or DC ties "within" an Interconnection and does not apply to DC ties "between" Interconnections?
<p><b>Response:</b> The ORS EC agrees with the balloter and will insert the phrase "interconnected by AC ties or DC (asynchronous) ties within the same Interconnection" in the first sentence of paragraph 2 of the interpretation.</p>				
Alden Briggs	New Brunswick System Operator	2	Negative	NBSO disagrees with this interpretation for two reasons: Firstly, 4. A Balancing Authority that is compliant with Reliability Standard BAL-002-0, Requirement R2 through participation in a Reserve Sharing Group Agreement is not required to establish additional operating agreements as described in Requirement R1 of EOP-001-0. Reserve Sharing agreements may not include emergency energy agreements. Secondly, From the 3rd paragraph on the interpretation: The responsible Balancing Authority is not required to have arrangements in place to obtain emergency energy assistance with all remote Balancing Authorities. This statement appears to state that an agreement is required with a remote BA. Though it is believed that this was not the intent of the interpretation it can cause confusion.
<p><b>Response:</b> Comment 1 – The ORS EC agrees with balloter and proposes to modify paragraph 4 of the interpretation to read, "A Reserve Sharing Group agreement that contains provisions for emergency assistance may be used to meet Requirement R1 of EOP-001-0." Comment 2 - The ORS EC agrees with balloter and proposes to modify paragraph 3 of the interpretation by changing the word "all" to "any" in the second sentence.</p>				
Richard Kinas	Orlando Utilities Commission	5	Affirmative	Since you decided to place Adjacent into the NERC glossary, I'm suprised that you did not decide to do the same with "remote" i.e. Remote - any entity that is not Adjacent
<p><b>Response:</b> The term Adjacent Balancing Authority is in the <i>Glossary of Terms Used in Reliability Standards</i>. The <i>Glossary of Terms Used in Reliability Standards</i> may not be modified via an interpretation.</p>				

Voter	Entity	Segment	Vote	Comment
Kim Warren	Independent Electricity System Operator	2	Negative	The IESO views the Reserve Sharing Group (RSG) and emergency assistance agreements as distinct and serving two separate and necessary functions. Under this interpretation we envisage situations where, despite the existence of the RSG agreement, emergency assistance (that may be needed for a lengthy period) may not be provided because its scope and conditions of supply are not defined. We believe this therefore leaves room for non-compliance and would expose the system to unreliable operation when emergency assistance is needed but cannot be arranged or delivered absent an operating agreement. We agree that a RSG agreement may be adequate to meet EOP-001-0, R1 but only if it explicitly includes provisions for emergency energy assistance.
<b>Response:</b> The ORS EC agrees with balloter and proposes to modify paragraph 4 of the interpretation to read, "A Reserve Sharing Group agreement that contains provisions for emergency assistance may be used to meet Requirement R1 of EOP-001-0."				
James Armke	Austin Energy	1	Negative	The Interpretation should clarify that the adjective "adjacent" is intended for neighboring Balancing Authorities interconnected by AC ties. For ERCOT, the requirement would be unnecessary and burdensom with no impact to reliability because flows across the DC ties remain at their scheduled values and do not impact neighboring Balancing Authorities.
<b>Response:</b> The ORS EC agrees with the balloter and will insert the phrase "interconnected by AC ties or DC (asynchronous) ties within the same Interconnection" in the first sentence of paragraph 2 of the interpretation.				
Gregory Campoli	New York Independent System Operator	2	Negative	The NYISO is concerned with the second sentence in Paragraph 3 that says, 'The responsible Balancing Authority is not required to have arrangements in place to obtain emergency energy assistance with all remote Balancing Authorities.' We are concerned that this means that a BA is required to have an agreement in place for purchasing emergency energy with at least one remote BA. We do not support this interpretation and believe that existing standard only obligates a BA to have agreements in place with adjacent BA's. The NYISO is also concerned that a Reserve Sharing Group (RSG) can be a substitute for emergency assistance agreement with adjacent BA's. Without an emergency assistance agreement, the scope of and conditions under which emergency energy assistance could be provided, will remain undefined.
<b>Response:</b> Comment 1 – The ORS EC agrees with balloter and proposes to modify paragraph 3 of the interpretation by changing the word "all" to "any" in the				

Voter	Entity	Segment	Vote	Comment
second sentence. Comment 2 – The ORS EC agrees with balloter and proposes to modify paragraph 4 of the interpretation to read, “A Reserve Sharing Group agreement that contains provisions for emergency assistance may be used to meet Requirement R1 of EOP-001-0.”				
Kent Saathoff	Electric Reliability Council of Texas, Inc.	10	Negative	The original interpretation was correct. This revised interpretation would apply requirements appropriate for adjacent entities connected synchronously by AC lines to entities connected only by asynchronous DC lines. Such requirements would serve no reliability purpose and be a waste of resources for entities connected solely by DC ties which have no uncontrolled flows.
<b>Response:</b> The ORS EC agrees with the balloter and will insert the phrase “interconnected by AC ties or DC (asynchronous) ties within the same Interconnection” in the first sentence of paragraph 2 of the interpretation.				
James R. Keller	Wisconsin Electric Power Marketing	3	Negative	The sentence within #3 of the EOP-001-1 R1 interpretation “The responsible Balancing Authority is not required to have arrangements in place to obtain emergency energy assistance with all remote Balancing Authorities.” is stating that the Responsible BA must have arrangements with some remote BAs. The “all” needs to be replaced with “any” in this sentence.
Linda Horn	Wisconsin Electric Power Co.	5	Negative	The sentence within #3 of the EOP-001-1 R1 interpretation “The responsible Balancing Authority is not required to have arrangements in place to obtain emergency energy assistance with all remote Balancing Authorities.” is stating that the Responsible BA must have arrangements with some remote BAs. The “all” needs to be replaced with “any” in this sentence.
<b>Response:</b> The ORS EC agrees with balloter and proposes to modify paragraph 3 of the interpretation by changing the word “all” to “any” in the second sentence.				
Anthony Jankowski	Wisconsin Energy Corp.	4	Negative	The wording related to Remote Balancing Authorities should read “with any” instead of “with all” in paragraph #3.
<b>Response:</b> The ORS EC agrees with balloter and proposes to modify paragraph 3 of the interpretation by changing the word “all” to “any” in the second sentence.				

**Project 2009-23: Interpretation of EOP-001-0 for the Regional Entity Compliance Managers  
 Consideration of Comments for Initial Ballot of Revision 2 (November 5–16, 2009)**

Summary Consideration: A few balloters explained that the wording in the response to question 2 appeared to limit the Balancing Authority to agreements with Balancing Authorities within the same interconnection, which may be interpreted to nullify the use of existing agreements that cross interconnections as sufficient to meet this requirement. In response to those comments, the Executive Committee of the Operating Reliability Subcommittee, which is serving as the drafting team for this interpretation, revised paragraph 2 to read, “The intent is that all Balancing Authorities, interconnected by AC ties or DC (asynchronous) ties within the same Interconnection, have emergency energy assistance agreements with at least one Adjacent Balancing Authority and have sufficient emergency energy assistance agreements to mitigate reasonably anticipated energy emergencies. However, the standard does not require emergency energy assistance agreements with all Adjacent Balancing Authorities, nor does it preclude having an emergency assistance agreement across Interconnections.”

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, Gerry Adamski, at 609-452-8060 or at gerry.adamski@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.<sup>1</sup>

Voter	Entity	Segment	Vote	Comment
Paul B. Johnson	American Electric Power	1	Negative	AEP appreciates the additional work of the SDT to improve the EOP-001-0 R1 interpretation. In most cases, AEP agrees with the changes that have been made. However, AEP is concerned that the word choice in the response to question 2. The wording appears to limit the BA to agreements with BAs within the same interconnection. In doing so, the standard may be interpreted to nullify the use of existing agreements that cross interconnections as sufficient to meet this requirement. AEP suggests that the wording be rephrased to avoid this implication. AEP also disagrees with the need to add the phrase "that contains provisions for emergency assistance may be used to meet" since the intent of entities participating in Reserve Sharing Groups is to have Reserves (Emergency Energy) available to them in the event of such a contingency. Access to "emergency assistance" (Emergency Energy by this interpretation) is only one aspect of an emergency operations plan. There are other elements of the emergency operations plan that can be deployed in an emergency to alleviate the issue in more lengthy events. To imply in this standard that conditions exists, such as "emergency assistance may be needed for duration," is not accurate; to suggest otherwise expands the scope of the existing requirement. It is AEP's belief that to expand the scope of this requirement to the extent IESO and NBSO suggests should require a full discussion of the industry in the next version of this standard.

<sup>1</sup> The appeals process is in the Reliability Standards Development Procedure: [http://www.nerc.com/files/RSDP\\_V6\\_1\\_12Mar07.pdf](http://www.nerc.com/files/RSDP_V6_1_12Mar07.pdf).



Voter	Entity	Segment	Vote	Comment
Raj Rana	American Electric Power	3	Negative	<p>AEP appreciates the additional work of the SDT to improve the EOP-001-0 R1 interpretation. In most cases, AEP agrees with the changes that have been made. However, AEP is concerned that the word choice in the response to question 2. The wording appears to limit the BA to agreements with BAs within the same interconnection. In doing so, the standard may be interpreted to nullify the use of existing agreements that cross interconnections as sufficient to meet this requirement. AEP suggests that the wording be rephrased to avoid this implication. AEP also disagrees with the need to add the phrase "that contains provisions for emergency assistance may be used to meet" since the intent of entities participating in Reserve Sharing Groups is to have Reserves (Emergency Energy) available to them in the event of such a contingency. Access to "emergency assistance" (Emergency Energy by this interpretation) is only one aspect of an emergency operations plan. There are other elements of the emergency operations plan that can be deployed in an emergency to alleviate the issue in more lengthy events. To imply in this standard that conditions exists, such as "emergency assistance may be needed for duration," is not accurate; to suggest otherwise expands the scope of the existing requirement. It is AEP's belief that to expand the scope of this requirement to the extent IESO and NBSO suggests should require a full discussion of the industry in the next version of this standard.</p>
Edward P. Cox	AEP Marketing	6	Negative	<p>AEP appreciates the additional work of the SDT to improve the EOP-001-0 R1 interpretation. In most cases, AEP agrees with the changes that have been made. However, AEP is concerned that the word choice in the response to question 2. The wording appears to limit the BA to agreements with BAs within the same interconnection. In doing so, the standard may be interpreted to nullify the use of existing agreements that cross interconnections as sufficient to meet this requirement. AEP suggests that the wording be rephrased to avoid this implication. AEP also disagrees with the need to add the phrase "that contains provisions for emergency assistance may be used to meet" since the intent of entities participating in Reserve Sharing Groups is to have Reserves (Emergency Energy) available to them in the event of such a contingency. Access to "emergency assistance" (Emergency Energy by this interpretation) is only one aspect of an emergency operations plan. There are other elements of the emergency operations plan that can be deployed in an emergency to alleviate the issue in more lengthy events. To imply in this standard that conditions exists, such as "emergency assistance may be needed for duration," is not accurate; to suggest otherwise expands the scope of the existing requirement. It is AEP's belief that to expand the scope of this requirement to the extent IESO and NBSO suggests should require a full discussion of the industry in the next version of this standard.</p>

Voter	Entity	Segment	Vote	Comment
<p><b>Response:</b> The Operating Reliability Subcommittee (ORS) Executive Committee agrees with AEP's comment and will add the phrase, "nor does it preclude having an emergency assistance agreement across Interconnections" at the end of paragraph 2.</p> <p>The ORS Executive Committee disagrees with the second part of AEP's comment because some Reserve Sharing Groups limit access to emergency assistance.</p>				
Robert Martinko	FirstEnergy Energy Delivery	1	Affirmative	FirstEnergy Corp. supports the interpretation and has voted Affirmative. We offer the following comments: Since this interpretation is specific to Version "0" of EOP-001, it is not clear how NERC staff will integrate this interpretation into Board Approved (October 2008) Version "1" of EOP-001. We suggest that NERC add this interpretation to the Version 1 standard which was revised per the NERC project "Operate Within Interconnection Reliability Operating Limits" which is currently pending filing with FERC.
Joanne Kathleen Borrell	FirstEnergy Solutions	3	Affirmative	FirstEnergy Corp. supports the interpretation and has voted Affirmative. We offer the following comments: Since this interpretation is specific to Version "0" of EOP-001, it is not clear how NERC staff will integrate this interpretation into Board Approved (October 2008) Version "1" of EOP-001. We suggest that NERC add this interpretation to the Version 1 standard which was revised per the NERC project "Operate Within Interconnection Reliability Operating Limits" which is currently pending filing with FERC.
Douglas Hohlbaugh	Ohio Edison Company	4	Affirmative	FirstEnergy Corp. supports the interpretation and has voted Affirmative. We offer the following comments: Since this interpretation is specific to Version "0" of EOP-001, it is not clear how NERC staff will integrate this interpretation into Board Approved (October 2008) Version "1" of EOP-001. We suggest that NERC add this interpretation to the Version 1 standard which was revised per the NERC project "Operate Within Interconnection Reliability Operating Limits" which is currently pending filing with FERC.
Kenneth Dresner	FirstEnergy Solutions	5	Affirmative	FirstEnergy Corp. supports the interpretation and has voted Affirmative. We offer the following comments: Since this interpretation is specific to Version "0" of EOP-001, it is not clear how NERC staff will integrate this interpretation into Board Approved (October 2008) Version "1" of EOP-001. We suggest that NERC add this interpretation to the Version 1 standard which was revised per the NERC project "Operate Within Interconnection Reliability Operating Limits" which is currently pending filing with FERC.
Mark S Travaglianti	FirstEnergy Solutions	6	Affirmative	FirstEnergy Corp. supports the interpretation and has voted Affirmative. We offer the following comments: Since this interpretation is specific to Version "0" of EOP-001, it is not clear how NERC staff will integrate this interpretation into Board Approved (October 2008) Version "1" of EOP-001. We suggest that NERC add this interpretation to the Version 1 standard which was revised per the NERC project "Operate Within Interconnection Reliability Operating Limits" which is currently pending filing with FERC.

Voter	Entity	Segment	Vote	Comment
<b>Response:</b> The ORS Executive Committee concurs with the comments of FirstEnergy.				
Kim Warren	Independent Electricity System Operator	2	Affirmative	The IESO thanks the Executive Committee of the NERC Operating Reliability Subcommittee for the effort that went into refining this interpretation. We also wish to highlight that inclusion of the phrase “within the same interconnection” in the revised response to Question 2, seems to preclude the possibility of adjacent Balancing Authorities that are not in the same interconnection, from entering into emergency energy assistance agreements.
<b>Response:</b> The ORS Executive Committee agrees with IESO's comment and will add the phrase, “nor does it preclude having an emergency assistance agreement across Interconnections” at the end of paragraph 2.				
Kirit S. Shah	Ameren Services	1	Affirmative	While the interpretation in 3) seemingly added the opportunity to use remote BAs (“A Balancing Authority’s agreement(s) with Adjacent Balancing Authorities does (do) not preclude the Adjacent Balancing Authority from purchasing emergency energy from remote Balancing Authorities.”) it does not address the obligation currently included in the standard. To wit, if a BA intends to use a remote BA for emergency assistance (as all or part of the energy it has identified that it needs to meet reasonably anticipated emergencies), It MUST have an agreement(s) with adjacent BAs “in the path” to facilitate this emergency assistance in addition to the agreement it will have with the remote BA. This additional sentence should be added to the Interpretation as the closing sentence in 3).
Mark Peters	Ameren Services	3	Affirmative	While the interpretation in 3) seemingly added the opportunity to use remote BAs (“A Balancing Authority’s agreement(s) with Adjacent Balancing Authorities does (do) not preclude the Adjacent Balancing Authority from purchasing emergency energy from remote Balancing Authorities.”) it does not address the obligation currently included in the standard. To wit, if a BA intends to use a remote BA for emergency assistance (as all or part of the energy it has identified that it needs to meet reasonably anticipated emergencies), It MUST have an agreement(s) with adjacent BAs “in the path” to facilitate this emergency assistance in addition to the agreement it will have with the remote BA. This additional sentence should be added to the Interpretation as the closing sentence in 3).
<b>Response:</b> The interpretation requires an emergency energy agreement with at least one adjacent Balancing Authority. However, it does not preclude having additional emergency energy agreements with remote Balancing Authorities. Specifying the appropriate arrangements to deliver the emergency energy goes beyond the scope of the request for interpretation.				

## 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](mailto:herb.schrayshuen@nerc.net). In addition, there is a NERC Reliability Standards Appeals Process.<sup>1</sup>

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.
<b>Response:</b> The ORS Executive Committee thanks Empire District Electric Co. its comment.				
Kevin Query	FirstEnergy Solutions	3	Affirmative	No Comment
<b>Response:</b> 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.
<b>Response:</b> 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

<sup>1</sup> The appeals process is in the Reliability Standards Development Procedure: [http://www.nerc.com/files/RSDP\\_V6\\_1\\_12Mar07.pdf](http://www.nerc.com/files/RSDP_V6_1_12Mar07.pdf).

Voter	Entity	Segment	Vote	Comment
				<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><b>Response:</b> 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>				

**Exhibit E**

**Consideration of Comments for interpretations to Requirements R3.2 of EOP-001-0 — Emergency Operations Planning**

**Project 2009-28: Interpretation of EOP-001-1 and EOP-001-2 for the Florida Municipal Power Pool  
Consideration of Comments for Initial Ballot (February 10–22, 2010)**

**Summary Consideration:**

Balloters who submitted negative votes with reasons were concerned about a possible expansion of the Balancing Authority requirements as a result of the interpretation. The balloters pointed out that, according to the standard as written, there is no requirement for agreements or for the Balancing Authority to follow Transmission Operator directives.

The drafting team recognizes it went outside the bounds of EOP-001-1 and EOP-001-2 in the effort to provide additional clarification in the interpretation. Accordingly, the drafting team is replacing the word “agreements” in the third sentence with “coordination.”

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, Gerry Adamski, at 609-452-8060 or at gerry.adamski@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.<sup>1</sup>

Voter	Entity	Segment	Vote	Comment
Kevin Query	FirstEnergy Solutions	3	Affirmative	No Comment
Anthony Jankowski	Wisconsin Energy Corp.	4	Negative	The answer does not provide a clear understanding of the standard. The third sentence of the answer adds a requirement that the BA plan include consideration for relationships and agreements, there is no requirement to have agreements. The second part of sentence four "or as previously agreed to with the Transmission Operator or the Reliability Coordinator to mitigate transmission emergencies" is not a standard requirement, thereby expanding the scope of the standard.
<p><b>Response:</b> The drafting team thanks you for your comments and is replacing the word “agreements” in the third sentence with “coordination.” The drafting team recognizes it went outside the bounds of EOP-001-1 and EOP-001-2 in the effort to provide additional clarification in the interpretation.</p>				
Kim Warren	Independent Electricity System Operator	2	Affirmative	The IESO is concerned that in recent months, there have been an increasing number of simplistic interpretations being put in front of the entire balloting body. In our view, some of the inquiries could have been addressed via other avenues than the formal interpretation process. We suggest that NERC expeditiously develop an alternative approach, similar to the Information Request Program established by the FRCC, to field industry questions before they rise up to the

<sup>1</sup> The appeals process is in the Reliability Standards Development Procedure: [http://www.nerc.com/files/RSDP\\_V6\\_1\\_12Mar07.pdf](http://www.nerc.com/files/RSDP_V6_1_12Mar07.pdf).

Voter	Entity	Segment	Vote	Comment
				formal interpretation request level. Industry participants should be encouraged to use other available resources and avenues instead of or before proceeding to a formal interpretation process to obtain understanding of standard applicability and compliance.
<b>Response:</b> The drafting team thanks you for your comment.				
Kent Saathoff	Electric Reliability Council of Texas, Inc.	10	Negative	The requirement in R2.2 is that BAs and TOPs develop, maintain, and implement a set of plans to mitigate operating emergencies on the transmission system. The interpretation states that the BA must have a plan and must take actions as directed by the TOP or the RC. The plain language of the requirement states that the BA must have a plan to mitigate operating emergencies. However, neither this particular requirement, nor any other part of the Standard (including the list of plan elements in Attachment 1-EOP-001-0 to the Standard) requires the BA to follow the directives of the TOP. That obligation is not a requirement under this Standard.
<b>Response:</b> The drafting team recognizes it went outside the bounds of EOP-001-1 and EOP-001-2 in the effort to provide additional clarification in the interpretation. The drafting team is replacing the word “agreements” in the third sentence with “coordination.”				



**Exhibit F**

**Complete Record of Development of the Interpretation of Requirement R1 of EOP-001-0 — Emergency Operations Planning**

## Project 2008-09 RECM Request for Interpretation - EOP-001-0 - Emergency Operations Planning

### Related Files

**Status:**

Approved by the Board of Trustees on November 4, 2010.

**Purpose/Industry Need:**

In accordance with the Reliability Standards Development Procedure, the interpretation must be posted for a 30-day pre-ballot review, and then balloted. There is no public comment period for an interpretation. Balloting will be conducted following the same method used for balloting standards. If the interpretation is approved by its ballot pool, then the interpretation will be appended to the standard and will become effective when adopted by the NERC Board of Trustees and approved by the applicable regulatory authorities. The interpretation will remain appended to the standard until the standard is revised through the normal standards development process. When the standard is revised, the clarifications provided by the interpretation will be incorporated into the revised standard.

Draft	Action	Dates	Results	Consideration of Comments
Draft 4 RECM Interpretation for EOP-001-0  Clean(32)	Recirculation Ballot  Info(33)   Vote>>	10/04/10 - 10/14/10	Summary (35)  Full Record(34)	
Revision 3 RECM Interpretation for EOP-001-0  <b>Revised Interpretation</b> Clean(25)   Redline(26)	Initial Ballot  Info(28)   Vote>>	04/15/10 - 04/26/10 (closed)	Summary (30)  Full Record(29)	Consideration of Comments (31)
	Pre-ballot Review  Info(27)   Join>>	03/16/10 - 04/15/10 (closed)		
Revision 2	Initial Ballot	11/05/09 - 11/16/09	Summary (23)	Consideration of Comments

RECM Interpretation for EOP-001-0	<a href="#">Info(21)</a>   <a href="#">Vote&gt;&gt;</a>	(closed)	<a href="#">Ballot Results(22)</a>	<b>(24)</b>
Revised Interpretation <a href="#">Clean(18)</a>   <a href="#">Redline(19)</a>  <a href="#">Request for Interpretation(17)</a>	Pre-ballot Review  <a href="#">Info(20)</a>   <a href="#">Join&gt;&gt;</a>	10/06/09 - 11/05/09 (closed)		
Revision 1  RECM Interpretation for EOP-001-0	Initial Ballot  <a href="#">Info(13)</a>   <a href="#">Vote&gt;&gt;</a>	02/27/09 - 03/09/09 (closed)	<a href="#">Summary(15)</a>  <a href="#">Ballot Results(14)</a>	<a href="#">Consideration of Comments(16)</a>
Revised Interpretation <a href="#">Clean(10)</a>   <a href="#">Redline(11)</a>  <a href="#">Request for Interpretation(9)</a>	Pre-ballot Review  <a href="#">Info(12)</a>   <a href="#">Join&gt;&gt;</a>	01/28/09 – 02/26/09 (closed)		
RECM Interpretation for EOP-001-0	Recirculation Ballot  <a href="#">Info(8)</a>  (Conducted in error Results are void)	01/06/09 - 01/15/09 (closed)		
RECM Interpretation for EOP-001-0  <a href="#">Interpretation(2)</a>  <a href="#">Request for Interpretation(1)</a>	Ballot Window <a href="#">Info(4)</a>   <a href="#">Vote&gt;&gt;</a>	06/19/08 – 07/02/08 (closed)	<a href="#">Summary(6)</a>  <a href="#">Full Record(5)</a>	<a href="#">Consideration of Comments(7)</a>
	Pre-ballot Review <a href="#">Info(3)</a>   <a href="#">Join&gt;&gt;</a>	05/19/08 – 06/19/08 (closed)		

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NORTH AMERICAN ELECTRIC  
RELIABILITY CORPORATION

April 2, 2008

Maureen Long  
Standards Process Manager  
North American Electric Reliability Corporation  
116-390 Village Blvd.  
Princeton, NJ 08540

**Re: Formal Interpretation Request for Reliability Standard EOP-001-0, Requirement 1**

Dear Maureen,

The Regional Entity Compliance Managers (RECM) request a formal interpretation of Reliability Standard EOP-001-0 — Emergency Operations Planning Requirement R1 in accordance with the Reliability Standards Development Procedure.

Material Impact: A formal interpretation is required for Regional Entities to consistently assess compliance with this standard and to ensure Registered Entities are meeting their obligation and responsibility as intended by the standard.

Clarification is needed for Reliability Standard EOP-001-0 Requirement R1 which states:

- R1.** Balancing Authorities shall have operating agreements with adjacent Balancing Authorities that shall, at a minimum, contain provisions for emergency assistance, including provisions to obtain emergency assistance from remote Balancing Authorities.

Specifically, the RECM requests an interpretation and clarity for the following language listed in EOP-001-0, Requirement 1:

1. What is the definition of emergency assistance in the context of this standard? What scope and time horizons, if any, are considered necessary in this definition?
2. What was intended by using the adjective “adjacent” in Requirement 1? Does “adjacent” Balancing Authorities mean “All” or something else? Is there qualifying criteria to determine if a very small adjacent Balancing Authority area has enough capacity to offer emergency assistance?
3. What is the definition of the word “remote” as stated in the last phrase of Requirement 1? Does remote mean every Balancing Authority who’s area does not physically touch the Balancing Authority attempting to comply with this Requirement?

4. Would a Balancing Authority that participates in a Reserve Sharing Group Agreement, which meets the requirements of Reliability Standard BAL-002-0, Requirement 2, be required to establish additional operating agreements to achieve compliance with Reliability Standard EOP-001-0, Requirement 1?

If you have any questions concerning this request please contact Susan Morris, Manager of Regional Compliance Program Oversight at [susan.morris@nerc.net](mailto:susan.morris@nerc.net) or (609) 240-6784.

Sincerely,

Regional Entity Compliance Managers:

Barry Pagel, Florida Reliability Coordinating Council  
Stanley Kopman, Northeast Power Coordinating Council  
Wayne VanOsdol, Midwest Reliability Organization  
Ray Palmieri, ReliabilityFirst Corporation  
Tom Galloway, SERC Reliability Corporation  
Ron Ciesiel, Southwest Power Pool Regional Entity  
Mark Henry, Texas Regional Entity  
Steve McCoy, Western Electricity Coordinating Council

CC: David Taylor  
Gerry Adamski  
Regional Entity Compliance Monitoring Group  
Compliance Department

## **Interpretation of EOP-001-0 Emergency Operations Planning Requirement R1 for the Regional Entity Compliance Managers**

### **Request for Interpretation Received from Regional Entity Compliance Managers on March 20, 2008:**

#### **Request:**

*The Regional Entity Compliance Managers (RECM) request a formal interpretation of Reliability Standard EOP-001-0 — Emergency Operations Planning Requirement R1 in accordance with the Reliability Standards Development Procedure.*

- 1. What is the definition of emergency assistance in the context of this standard? What scope and time horizons, if any, are considered necessary in this definition?*
- 2. What was intended by using the adjective “adjacent” in Requirement 1? Does “adjacent Balancing Authorities” mean “All” or something else? Is there qualifying criteria to determine if a very small adjacent Balancing Authority area has enough capacity to offer emergency assistance?*
- 3. What is the definition of the word “remote” as stated in the last phrase of Requirement 1? Does remote mean every Balancing Authority who’s area does not physically touch the Balancing Authority attempting to comply with this Requirement?*
- 4. Would a Balancing Authority that participates in a Reserve Sharing Group Agreement, which meets the requirements of Reliability Standard BAL-002-0, Requirement 2, have to establish additional operating agreements to achieve compliance with Reliability Standard EOP-001-0, Requirement 1?*

#### **EOP-001-0**

**R1. Balancing Authorities shall have operating agreements with adjacent Balancing Authorities that shall, at a minimum, contain provisions for emergency assistance, including provisions to obtain emergency assistance from remote Balancing Authorities.**

**The following interpretation of EOP-001-0 — Emergency Operations Planning Requirement R1 was developed by the Executive Committee of the NERC Operating Reliability Subcommittee on May 9, 2008:**

#### **Interpretation of EOP-001-0 Requirement R1:**

- 1. In the context of this standard, emergency assistance is emergency energy. Emergency energy would normally be arranged for during the current operating day. The agreement should describe the conditions under which the emergency energy will be delivered to the responsible Balancing Authority.**
- 2. An adjacent Balancing Authority is one that has AC tie lines with the responsible Balancing Authority. The standard does not require emergency energy assistance agreements with *all* adjacent Balancing Authorities. The intent is that all Balancing Authorities have emergency energy assistance agreements with at least one adjacent Balancing Authority and have sufficient emergency energy assistance agreements to mitigate reasonably anticipated energy emergencies.**

3. A remote Balancing Authority is a Balancing Authority other than an adjacent Balancing Authority. The responsible Balancing Authority is not required to have arrangements in place to obtain emergency energy assistance with all remote Balancing Authorities. The responsible Balancing Authority's agreement(s) with the adjacent Balancing Authorities does (do) not preclude the adjacent Balancing Authority from purchasing emergency energy from remote Balancing Authorities on behalf of the responsible Balancing Authority.
4. A Balancing Authority that is compliant with Reliability Standard BAL-002-0, Requirement R2 through participation in a Reserve Sharing Group Agreement is not required to establish additional operating agreements as described in Requirement R1 of EOP-001-0.



## Standards Announcement

### Ballot Pool and Pre-ballot Window Opens

May 19–June 19, 2008

Now available at: <https://standards.nerc.net/BallotPool.aspx>

### **Pre-ballot Window and Ballot Pool for Interpretation of EOP-001-0 Requirement R1 for Regional Entity Compliance Managers (Project 2008-09)**

The Regional Entity Compliance Managers group submitted a [Request for an Interpretation](#) of EOP-001-0 — Emergency Operations Planning Requirement 1. Under Requirement 1, the Balancing Authority must have operating agreements with adjacent Balancing Authorities that contain provisions for emergency assistance, including emergency assistance from remote Balancing Authorities. The request asked for the following clarifications:

- Define the scope and time horizon associated with “emergency assistance.”
- Does “adjacent Balancing Authority” mean one or all adjacent Balancing Authorities?
- What is a “remote Balancing Authority?”
- Does a Balancing Authority participating in a Reserve Sharing Group under BAL-002-0 need additional operating agreements to be compliant with EOP-001-0 Requirement R1?

The [Interpretation](#) provides the following clarifications:

- Emergency assistance is emergency “energy” and would normally be arranged for during the current operating day. The agreement should describe the conditions under which the emergency energy will be delivered to the responsible Balancing Authority.
- An adjacent Balancing Authority is one that has AC tie lines with the responsible Balancing Authority and the standard does not require agreements with all adjacent Balancing Authorities.
- A remote Balancing Authority is a Balancing Authority other than an adjacent Balancing Authority and the responsible Balancing Authority is not required to have arrangements in place to obtain emergency energy assistance with all remote Balancing Authorities.
- A Balancing Authority that is compliant with BAL-002-0 — Disturbance Control Performance Requirement 2 through participation in a Reserve Sharing Group Agreement, is not required to establish additional operating agreements for EOP-001-0 Requirement 1.

A new [ballot pool](#) to vote on this interpretation has been formed and will remain open up until 8 a.m. (EDT) Thursday, June 19, 2008. During the pre-ballot window, members of the ballot pool may communicate with one another by using their “ballot pool list server.” The list server for this ballot pool is: [bp-Intp\\_EOP-001\\_R1\\_RECM\\_in@nerc.com](mailto:bp-Intp_EOP-001_R1_RECM_in@nerc.com)

### **Standards Development Process**

The [Reliability Standards Development Procedure](#) contains all the procedures governing the standards



development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate.

*For more information or assistance, please contact Maureen Long, Standards Process Manager, at [maureen.long@nerc.net](mailto:maureen.long@nerc.net) or at (813) 468-5998.*

North American Electric Reliability Corporation  
116-390 Village Blvd.  
Princeton, NJ 08540  
609.452.8060 | [www.nerc.com](http://www.nerc.com)



## Standards Announcement

Ballot Window Open

June 19–June 30, 2008

Now available at: <https://standards.nerc.net/CurrentBallots.aspx>

### **Ballot Window for Interpretation of EOP-001-0 Requirement R1 for Regional Entity Compliance Managers is Open**

The [initial ballot](#) for the Interpretation of EOP-001-0 — Emergency Operations Planning Requirement R1 for the Regional Entity Compliance Managers is open through **8 p.m. EDT, Monday, June 30, 2008**.

The Regional Entity Compliance Managers group submitted a [Request for an Interpretation](#) of EOP-001-0 — Emergency Operations Planning Requirement R1. Under Requirement R1, the Balancing Authority must have operating agreements with adjacent Balancing Authorities that contain provisions for emergency assistance, including emergency assistance from remote Balancing Authorities. The request asked for the following clarifications:

- Define the scope and time horizon associated with “emergency assistance.”
- Does “adjacent Balancing Authority” mean one or all adjacent Balancing Authorities?
- What is a “remote Balancing Authority?”
- Does a Balancing Authority participating in a Reserve Sharing Group under BAL-002-0 need additional operating agreements to be compliant with EOP-001-0 Requirement R1?

The [Interpretation](#) provides the following clarifications:

- Emergency assistance is emergency “energy” and would normally be arranged for during the current operating day. The agreement should describe the conditions under which the emergency energy will be delivered to the responsible Balancing Authority.
- An adjacent Balancing Authority is one that has AC tie lines with the responsible Balancing Authority and the standard does not require agreements with all adjacent Balancing Authorities.
- A remote Balancing Authority is a Balancing Authority other than an adjacent Balancing Authority and the responsible Balancing Authority is not required to have arrangements in place to obtain emergency energy assistance with all remote Balancing Authorities.
- A Balancing Authority that is compliant with BAL-002-0 — Disturbance Control Performance Requirement R2 through participation in a Reserve Sharing Group Agreement, is not required to establish additional operating agreements for EOP-001-0 Requirement R1.

### **Standards Development Process**

The [Reliability Standards Development Procedure Manual](#) contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate.

*For more information or assistance, please contact Maureen Long,  
Standards Process Manager, at [maureen.long@nerc.net](mailto:maureen.long@nerc.net) or at (813) 468-5998.*

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116-390 Village Blvd.  
Princeton, NJ 08540  
609.452.8060 | [www.nerc.com](http://www.nerc.com)

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Ballot Results	
<b>Ballot Name:</b>	Interpretation Request - EOP-001 - R1 - RECM_in
<b>Ballot Period:</b>	6/19/2008 - 7/2/2008
<b>Ballot Type:</b>	Initial
<b>Total # Votes:</b>	162
<b>Total Ballot Pool:</b>	191
<b>Quorum:</b>	<b>84.82 % The Quorum has been reached</b>
<b>Weighted Segment Vote:</b>	85.79 %
<b>Ballot Results:</b>	<b>The standard will proceed to recirculation ballot.</b>

Summary of Ballot Results									
Segment	Ballot Pool	Segment Weight	Affirmative		Negative		Abstain	No Vote	
			# Votes	Fraction	# Votes	Fraction	# Votes		
1 - Segment 1.		55	1	40	0.889	5	0.111	2	8
2 - Segment 2.		9	0.8	6	0.6	2	0.2	0	1
3 - Segment 3.		51	1	36	0.9	4	0.1	1	10
4 - Segment 4.		10	0.8	8	0.8	0	0	0	2
5 - Segment 5.		32	1	26	0.963	1	0.037	0	5
6 - Segment 6.		21	1	15	0.882	2	0.118	1	3
7 - Segment 7.		0	0	0	0	0	0	0	0
8 - Segment 8.		2	0.2	2	0.2	0	0	0	0
9 - Segment 9.		3	0.3	1	0.1	2	0.2	0	0
10 - Segment 10.		8	0.7	5	0.5	2	0.2	1	0
<b>Totals</b>		<b>191</b>	<b>6.8</b>	<b>139</b>	<b>5.834</b>	<b>18</b>	<b>0.966</b>	<b>5</b>	<b>29</b>

Individual Ballot Pool Results				
Segment	Organization	Member	Ballot	Comments
1	Allegheny Power	Rodney Phillips	Affirmative	
1	Ameren Services Company	Kirit S. Shah	Affirmative	
1	American Electric Power	Paul B. Johnson	Affirmative	
1	American Transmission Company, LLC	Jason Shaver	Abstain	
1	Arizona Public Service Co.	Cary B. Deise		
1	Avista Corp.	Scott Kinney	Affirmative	
1	Bonneville Power Administration	Donald S. Watkins	Affirmative	<a href="#">View</a>
1	Central Maine Power Company	Brian Conroy		
1	Consolidated Edison Co. of New York	Edwin E. Thompson PE	Negative	<a href="#">View</a>
1	Dairyland Power Coop.	Robert W. Roddy	Affirmative	
1	Dominion Virginia Power	William L. Thompson	Affirmative	
1	Duke Energy Carolina	Douglas E. Hils	Affirmative	<a href="#">View</a>
1	E.ON U.S. LLC	Larry Monday	Affirmative	

1	Entergy Corporation	George R. Bartlett	Affirmative	
1	FirstEnergy Energy Delivery	Robert Martinko	Affirmative	<a href="#">View</a>
1	Florida Keys Electric Cooperative Assoc.	Dennis Minton	Affirmative	
1	Florida Power & Light Co.	C. Martin Mennes	Affirmative	
1	Great River Energy	Gordon Pietsch	Affirmative	
1	Hydro One Networks, Inc.	Ajay Garg		
1	Idaho Power Company	Ronald D. Schellberg	Affirmative	
1	Kansas City Power & Light Co.	Jim Useldinger	Affirmative	
1	Lincoln Electric System	Doug Bantam		
1	Manitoba Hydro	Michelle Rheault	Affirmative	
1	Minnesota Power, Inc.	Carol Gerou	Affirmative	
1	Municipal Electric Authority of Georgia	Jerry J Tang	Affirmative	
1	National Grid	Michael J Ranalli	Negative	<a href="#">View</a>
1	New Brunswick Power Transmission Corporation	Wayne N. Snowdon	Negative	<a href="#">View</a>
1	New York Power Authority	Ralph Rufrano	Negative	<a href="#">View</a>
1	New York State Electric & Gas Corp.	Henry G. Masti		
1	Northeast Utilities	David H. Boguslawski	Negative	<a href="#">View</a>
1	Northern Indiana Public Service Co.	Joseph Dobes	Affirmative	
1	Ohio Valley Electric Corp.	Robert Matthey	Affirmative	
1	Oklahoma Gas and Electric Co.	Marvin E VanBebber	Affirmative	
1	Omaha Public Power District	Iorees Tadros		
1	Oncor Electric Delivery	Charles W. Jenkins	Affirmative	
1	Orlando Utilities Commission	Brad Chase	Affirmative	
1	Otter Tail Power Company	Lawrence R. Larson	Affirmative	
1	PacifiCorp	Robert Williams		
1	Potomac Electric Power Co.	Richard J. Kafka	Affirmative	
1	PP&L, Inc.	Ray Mammarella	Affirmative	
1	Progress Energy Carolinas	Sammy Roberts	Affirmative	
1	Public Service Electric and Gas Co.	Kenneth D. Brown	Affirmative	
1	Sacramento Municipal Utility District	Dilip Mahendra	Affirmative	
1	Salt River Project	Robert Kondziolka	Affirmative	
1	Santee Cooper	Terry L. Blackwell	Affirmative	
1	SaskPower	Wayne Guttormson	Abstain	
1	Seattle City Light	Christopher M. Turner	Affirmative	
1	Sierra Pacific Power Co.	Richard Salgo	Affirmative	
1	Southern California Edison Co.	Dana Cabbell	Affirmative	
1	Southern Company Services, Inc.	Horace Stephen Williamson	Affirmative	
1	Southwest Transmission Cooperative, Inc.	James L. Jones	Affirmative	
1	Tampa Electric Co.	Thomas J. Szelistowski	Affirmative	
1	Tennessee Valley Authority	Larry Akens	Affirmative	
1	Tucson Electric Power Co.	Ronald P. Belval		
1	Xcel Energy, Inc.	Gregory L. Pieper	Affirmative	
2	Alberta Electric System Operator	Anita Lee		
2	British Columbia Transmission Corporation	Phil Park	Affirmative	
2	California ISO	David Hawkins	Affirmative	
2	Electric Reliability Council of Texas, Inc.	Roy D. McCoy	Affirmative	
2	Independent Electricity System Operator	Kim Warren	Negative	<a href="#">View</a>
2	ISO New England, Inc.	Kathleen Goodman	Negative	<a href="#">View</a>
2	Midwest ISO, Inc.	Terry Bilke	Affirmative	
2	New York Independent System Operator	Gregory Campoli	Affirmative	
2	PJM Interconnection, L.L.C.	Tom Bowe	Affirmative	
3	Alabama Power Company	Robin Hurst	Affirmative	
3	Allegheny Power	Bob Reeping	Affirmative	
3	American Electric Power	Raj Rana	Affirmative	

3	Arizona Public Service Co.	Thomas R. Glock	Affirmative	
3	Atlantic City Electric Company	James V. Petrella	Affirmative	
3	BC Hydro and Power Authority	Pat G. Harrington	Abstain	
3	Bonneville Power Administration	Rebecca Berdahl	Affirmative	<a href="#">View</a>
3	City of Tallahassee	Rusty S. Foster		
3	City Public Service of San Antonio	Edwin Les Barrow	Affirmative	
3	Cleco Utility Group	Bryan Y Harper	Affirmative	
3	Consolidated Edison Co. of New York	Peter T Yost	Negative	<a href="#">View</a>
3	Consumers Energy	David A. Lapinski	Affirmative	<a href="#">View</a>
3	Delmarva Power & Light Co.	Michael R. Mayer	Affirmative	
3	Dominion Resources, Inc.	Jalal (John) Babik	Affirmative	
3	Duke Energy Carolina	Henry Ernst-Jr	Affirmative	
3	Entergy Services, Inc.	Matt Wolf	Affirmative	
3	Farmington Electric Utility System	Alan Glazner	Affirmative	
3	FirstEnergy Solutions	Joanne Kathleen Borrell	Affirmative	<a href="#">View</a>
3	Florida Municipal Power Agency	Michael Alexander	Affirmative	
3	Florida Power & Light Co.	W.R. Schoneck		
3	Florida Power Corporation	Lee Schuster	Affirmative	
3	Georgia Power Company	Leslie Sibert	Affirmative	
3	Georgia System Operations Corporation	Edward W Pourciau	Affirmative	
3	Gulf Power Company	Gwen S Frazier	Affirmative	
3	Hydro One Networks, Inc.	Michael D. Penstone	Negative	<a href="#">View</a>
3	Kissimmee Utility Authority	Gregory David Woessner		
3	Lincoln Electric System	Bruce Merrill		
3	Louisville Gas and Electric Co.	Charles A. Freibert	Affirmative	<a href="#">View</a>
3	Manitoba Hydro	Ronald Dacombe	Affirmative	
3	MidAmerican Energy Co.	Thomas C. Mielnik	Affirmative	
3	Mississippi Power	Don Horsley	Affirmative	
3	New York Power Authority	Christopher Lawrence de Graffenried	Negative	<a href="#">View</a>
3	Niagara Mohawk (National Grid Company)	Michael Schiavone	Negative	<a href="#">View</a>
3	Orlando Utilities Commission	Ballard Keith Mutters	Affirmative	
3	PECO Energy an Exelon Co.	John J. McCawley		
3	Platte River Power Authority	Terry L Baker	Affirmative	
3	Potomac Electric Power Co.	Robert Reuter	Affirmative	
3	Progress Energy Carolinas	Sam Waters	Affirmative	
3	Public Service Electric and Gas Co.	Jeffrey Mueller	Affirmative	
3	Public Utility District No. 1 of Chelan County	Kenneth R. Johnson	Affirmative	
3	Public Utility District No. 2 of Grant County	Greg Lange	Affirmative	
3	Rochester Public Utilities	Gerald Steffens		
3	San Diego Gas & Electric	Scott Peterson		
3	Santee Cooper	Zack Dusenbury	Affirmative	
3	Seattle City Light	Dana Wheelock	Affirmative	
3	South Carolina Electric & Gas Co.	Hubert C. Young		
3	Tampa Electric Co.	Ronald L. Donahey	Affirmative	
3	Tennessee Valley Authority	Cynthia Herron		
3	Wisconsin Electric Power Marketing	James R. Keller	Affirmative	
3	Wisconsin Public Service Corp.	James A. Maenner		
3	Xcel Energy, Inc.	Michael Ibold	Affirmative	
4	Alliant Energy Corp. Services, Inc.	Kenneth Goldsmith	Affirmative	
4	Consumers Energy	David Frank Ronk	Affirmative	<a href="#">View</a>
4	Florida Municipal Power Agency	Ralph Anderson	Affirmative	
4	Madison Gas and Electric Co.	Joseph G. DePoorter	Affirmative	
4	Northern California Power Agency	Fred E. Young	Affirmative	
4	Old Dominion Electric Coop.	Mark Ringhausen	Affirmative	
4	Rochester Public Utilities	Greg Woodworth		
4	Seattle City Light	Hao Li	Affirmative	

4	Seminole Electric Cooperative, Inc.	Steven R. Wallace		
4	Wisconsin Energy Corp.	Anthony Jankowski	Affirmative	
5	AEP Service Corp.	Brock Ondayko	Affirmative	
5	Alabama Electric Coop. Inc.	Tim Hattaway	Affirmative	
5	Avista Corp.	Edward F. Groce	Affirmative	
5	BC Hydro and Power Authority	Clement Ma		
5	Bonneville Power Administration	Francis J. Halpin	Affirmative	<a href="#">View</a>
5	City of Farmington	Clinton J Jacobs	Affirmative	
5	City of Tallahassee	Alan Gale	Affirmative	
5	Colmac Clarion/Piney Creek LP	Harvie D. Beavers	Affirmative	
5	Conectiv Energy Supply, Inc.	Richard K. Douglass	Affirmative	
5	Dairyland Power Coop.	Warren Schaefer		
5	Detroit Edison Company	Ronald W. Bauer	Affirmative	
5	Entergy Corporation	Stanley M Jaskot	Affirmative	
5	FirstEnergy Solutions	Kenneth Dresner		
5	Florida Municipal Power Agency	Douglas Keegan	Affirmative	
5	Great River Energy	Cynthia E Sulzer	Affirmative	
5	JEA	Donald Gilbert	Affirmative	
5	Lincoln Electric System	Dennis Florom		
5	Louisville Gas and Electric Co.	Charlie Martin	Affirmative	<a href="#">View</a>
5	Manitoba Hydro	Mark Aikens	Affirmative	
5	New York Power Authority	Gerald Mannarino	Negative	
5	Orlando Utilities Commission	Richard Kinas	Affirmative	
5	PPL Generation LLC	Mark A. Heimbach	Affirmative	
5	Reliant Energy Services	Thomas J. Bradish	Affirmative	
5	Salt River Project	Glen Reeves	Affirmative	
5	Seattle City Light	Michael J. Haynes	Affirmative	
5	Southeastern Power Administration	Douglas Spencer	Affirmative	
5	Southern California Edison Co.	David Schiada	Affirmative	
5	Southern Company Services, Inc.	Roger D. Green	Affirmative	
5	Tampa Electric Co.	Frank L Busot	Affirmative	
5	U.S. Army Corps of Engineers Northwestern Division	Karl Bryan	Affirmative	
5	Wisconsin Electric Power Co.	Linda Horn	Affirmative	
5	Xcel Energy, Inc.	Stephen J. Beuning		
6	AEP Marketing	Edward P. Cox	Affirmative	
6	Bonneville Power Administration	Brenda S. Anderson	Affirmative	<a href="#">View</a>
6	Consolidated Edison Co. of New York	Nickesha P Carrol	Negative	<a href="#">View</a>
6	Dominion Resources, Inc.	Louis S Slade	Affirmative	
6	Entergy Services, Inc.	William Franklin	Affirmative	<a href="#">View</a>
6	FirstEnergy Solutions	Mark S Travaglianti	Affirmative	<a href="#">View</a>
6	Florida Municipal Power Agency	Robert C. Williams	Affirmative	
6	Great River Energy	Donna Stephenson	Affirmative	
6	Lincoln Electric System	Eric Ruskamp		
6	Louisville Gas and Electric Co.	Daryn Barker	Affirmative	<a href="#">View</a>
6	Manitoba Hydro	Daniel Prowse	Affirmative	
6	New York Power Authority	Thomas Papadopoulos	Negative	
6	Progress Energy Carolinas	James Eckelkamp	Affirmative	
6	Public Utility District No. 1 of Chelan County	Hugh A. Owen	Abstain	
6	Salt River Project	Mike Hummel	Affirmative	
6	Santee Cooper	Suzanne Ritter	Affirmative	
6	Seminole Electric Cooperative, Inc.	Trudy S. Novak		
6	Southern California Edison Co.	Marcus V Lotto	Affirmative	
6	Southern Indiana Gas and Electric Co.	Brad Lisembee		
6	Tampa Electric Co.	Jose Benjamin Quintas	Affirmative	
6	Xcel Energy, Inc.	David F. Lemmons	Affirmative	
8	JDRJC Associates	Jim D. Cyrulewski	Affirmative	
8	Other	Michehl R. Gent	Affirmative	
9	California Energy Commission	William Mitchell Chamberlain	Affirmative	

9	Commonwealth of Massachusetts Department of Public Utilities	Donald E. Nelson	Negative	<a href="#">View</a>
9	National Association of Regulatory Utility Commissioners	Diane J. Barney	Negative	<a href="#">View</a>
10	Electric Reliability Council of Texas, Inc.	Kent Saathoff	Affirmative	
10	Florida Reliability Coordinating Council	Linda Campbell	Abstain	
10	Midwest Reliability Organization	Larry Brusseau	Affirmative	
10	New York State Reliability Council	Alan Adamson	Negative	
10	Northeast Power Coordinating Council, Inc.	Edward A. Schwerdt	Negative	<a href="#">View</a>
10	SERC Reliability Corporation	Carter B Edge	Affirmative	
10	Southwest Power Pool	Charles H. Yeung	Affirmative	
10	Western Electricity Coordinating Council	Louise McCarren	Affirmative	

609.452.8060 (Voice) - 609.452.9550 (Fax)

116-390 Village Boulevard, Princeton, New Jersey 08540-5721

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## Standards Announcement

### Initial Ballot Results for Project 2008-09

Now available at: <https://standards.nerc.net/Ballots.aspx>

#### **Initial Ballot Results for Interpretation of EOP-001 Requirement R1 for the Regional Entity Compliance Managers**

The initial ballot for the [Interpretation of Requirement R1 in EOP-001-0](#) — Emergency Operations Planning (for the Regional Entity Compliance Managers), was conducted from June 19 through July 2, 2008.

The ballot achieved a quorum, however there were some negative ballots with comments, initiating the need to review the comments before proceeding. The drafting team will be reviewing comments submitted with the ballot and preparing its consideration of those comments. ([Detailed Ballot Results](#))

Quorum:	84.82 %
Approval:	85.79 %

#### **Standards Development Process**

The [Reliability Standards Development Procedure Manual](#) contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate.

*For more information or assistance, please contact Maureen Long,  
Standards Process Manager, at [maureen.long@nerc.net](mailto:maureen.long@nerc.net) or at (813) 468-5998.*

North American Electric Reliability Corporation  
116-390 Village Blvd.  
Princeton, NJ 08540  
609.452.8060 | [www.nerc.com](http://www.nerc.com)

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## Consideration of Comments on Initial Ballot RECM Interpretation Request — EOP-001, R1

**Summary Consideration:** Some entities requested clarification for using dc voltages, the definition of adjacent regarding Balancing Authorities, and how much was “enough” energy emergency assistance. A few entities suggested increased requirements for emergency energy assistance and reserve sharing group participation. The drafting team modified the language in the interpretation to use the defined term Adjacent Balancing Authority and clarified that the requirement does not require energy assistance agreements with all Adjacent Balancing Authorities. The team will submit certain suggestions regarding requirements to the manager of standards development.

Segment	Entity	Ballot	Comments
1	Bonneville Power Administration	Affirmative	In Item 2, we recommend replacing "AC" with "AC and/or DC tie lines in the same interconnection" We strongly support the item 4 interpretation regarding reserve sharing groups.
<p><b>Response:</b> The drafting team agrees with your comment and proposes to use the NERC Glossary of Terms definition of Adjacent Balancing Authority, which doesn't limit interconnections to AC ties.</p>			
1	Consolidated Edison Co. of New York	Negative	DC ties should have been referenced and included in the interpretation, agreements with ALL adjacent BAs should be required. Specific Emergency Energy Agreements should either be explicit parts of the operating agreements or developed separately and in place as well. Also, participation in a Reserve Sharing Group may be insufficient to meet Requirement R1
<p><b>Response:</b> The drafting team agrees with your comment and proposes to use the NERC Glossary of Terms definition of Adjacent Balancing Authority, which doesn't limit interconnections to AC ties.</p> <p>The intent of the interpretation is to require energy assistance agreements with enough BAs to have sufficient emergency energy assistance agreements to mitigate reasonably anticipated energy emergencies. Having emergency energy assistance agreements with all BAs may exceed what is required to maintain an adequate level of reliability.</p> <p>The technical criteria for establishing what constitutes sufficient emergency assistance should be established through the Standards Development Process.</p>			
1	Duke Energy Carolina	Affirmative	Duke Energy appreciates the opportunity to comment on this Interpretation . Duke Energy supports the concepts in this Interpretation; however, there remain some issues that should be dealt within a Standards Authorization Request to revise the standard. In addition, using a general term such as "enough" still keeps the Balancing Authority in the position of a compliance team interpretation of "enough". Duke Energy believes that the Interpretation should clarify that in the context of this standard, emergency assistance is emergency energy. Emergency energy would normally be arranged for during the current operating day. The agreement should describe the conditions

**Consideration of Comments on Initial ballot RECM Interpretation Request — EOP-001, R1**

Segment	Entity	Ballot	Comments
			under which the emergency energy will be delivered to the responsible Balancing Authority. The intent of this standard is that all Balancing Authorities should have sufficient emergency assistance agreements in order to meet Control Performance Standards, Disturbance Control Standards and other applicable standards. Therefore emergency assistance agreements are not required with all adjacent Balancing Authorities. Such agreements may also be in place with remote Balancing Authorities, but are not required.
<b>Response:</b> The drafting team agrees with your comments and will submit them to the manager of standards development for inclusion in the Standards "Issues" database.			
1	FirstEnergy Energy Delivery	Affirmative	FirstEnergy supports the interpretation provided for EOP-001 Requirement R1 and believes it further clarifies Balancing Authority expectations related to emergency assistance agreements with other Balancing Authorities. It is expected that the standards drafting team working on Project 2008-03 will reference this interpretation when completing revisions to the EOP-001 standard to achieve greater clarity within the standard's requirements and measures. The only question we raise and seek clarification to is in regards to item #2 and we question why the interpretation excludes DC ties when defining an adjacent Balancing Authority? As written, would a Balancing Authority be precluded from obtaining emergency assistance from a BA with whom they may only have DC interconnection(s)? Or, is the intent that a DC tie is considered a remote Balancing Authority and covered by item #3?
<b>Response:</b> The drafting team agrees with your comment and proposes to use the NERC Glossary of Terms definition of Adjacent Balancing Authority, which doesn't limit interconnections to AC ties.			
1	National Grid	Negative	National Grid agrees with the comments made by NPCC and other NPCC members: EOP-001, R1 states "Balancing Authorities shall have operating agreements with adjacent Balancing Authorities that shall, at a minimum, contain provisions for emergency assistance, including provisions to obtain emergency assistance from remote Balancing Authorities. We feel that emergency assistance agreements should be made with ALL adjacent BAs which is contrary to the interpretation which states the intent is to have emergency agreements with at least one adjacent BA. Additionally, the interpretation states that "The responsible Balancing Authority is not required to have arrangements in place to obtain emergency energy assistance with all remote Balancing Authorities". We feel that emergency agreements with ALL adjacent BAs further needs to be in place in order for a BA to get remote assistance from a non-adjacent or through an adjacent BA. DC ties should have been referenced and included in the interpretation. The interpretation furthers states that a BA that is compliant with BAL-002 —" Disturbance Control Performance Requirement R2 through participation in a Reserve

**Consideration of Comments on Initial ballot RECM Interpretation Request — EOP-001, R1**

Segment	Entity	Ballot	Comments
			Sharing Group Agreement, is not required to establish additional operating agreements for EOP-001-0 Requirement R1. We feel that participation in a Reserve Sharing Group may be insufficient to meet Requirement 1.
<p><b>Response:</b> The drafting team agrees with your comment and proposes to use the NERC Glossary of Terms definition of Adjacent Balancing Authority, which doesn't limit interconnections to AC ties.</p> <p>The intent of the interpretation is to require energy assistance agreements with enough BAs to have sufficient emergency energy assistance agreements to mitigate reasonably anticipated energy emergencies. Having emergency energy assistance agreements with all BAs may exceed what is required to maintain an adequate level of reliability.</p> <p>The technical criteria for establishing what constitutes sufficient emergency assistance should be established through the Standards Development Process.</p>			
1	New Brunswick Power Transmission Corporation	Negative	DC ties should have been referenced and included in the interpretation, agreements with ALL adjacent BAs should be required. Specific Emergency Energy Agreements should either be explicit parts of the operating agreements or developed separately and in place as well. Also, participation in a Reserve Sharing Group may be insufficient to meet Requirement R1.
<p><b>Response:</b> The intent of the interpretation is to require energy assistance agreements with enough BAs to have sufficient emergency energy assistance agreements to mitigate reasonably anticipated energy emergencies. Having emergency energy assistance agreements with all BAs may exceed what is required to maintain an adequate level of reliability.</p> <p>The technical criteria for establishing what constitutes sufficient emergency assistance should be established through the Standards Development Process.</p>			
1	New York Power Authority	Negative	DC ties should have been referenced and included in the interpretation, agreements with ALL adjacent BAs should be required. Specific Emergency Energy Agreements should either be explicit parts of the operating agreements or developed separately and in place as well. Also, participation in a Reserve Sharing Group may be insufficient to meet Requirement R1.
<p><b>Response:</b> The drafting team agrees with your comment and proposes to use the NERC Glossary of Terms definition of Adjacent Balancing Authority, which doesn't limit interconnections to AC ties.</p> <p>The intent of the interpretation is to require energy assistance agreements with enough BAs to have sufficient emergency energy assistance agreements to mitigate reasonably anticipated energy emergencies. Having emergency energy assistance agreements with all BAs may exceed what is required to maintain an adequate level of reliability.</p> <p>The technical criteria for establishing what constitutes sufficient emergency assistance should be established through the Standards Development Process.</p>			
1	Northeast Utilities	Negative	DC ties should be referenced and included in the interpretation. Agreements with ALL adjacent BAs should be required. Specific Emergency Energy Agreements should either be explicit parts of the operating agreements, or developed separately and in place as well.
<p><b>Response:</b> The drafting team agrees with your comment and proposes to use the NERC Glossary of Terms definition of Adjacent Balancing Authority, which</p>			

**Consideration of Comments on Initial ballot RECM Interpretation Request — EOP-001, R1**

Segment	Entity	Ballot	Comments
<p>doesn't limit interconnections to AC ties.</p> <p>The intent of the interpretation is to require energy assistance agreements with enough BAs to have sufficient emergency energy assistance agreements to mitigate reasonably anticipated energy emergencies. Having emergency energy assistance agreements with all BAs may exceed what is required to maintain an adequate level of reliability.</p>			
2	Independent Electricity System Operator	Negative	<p>While the IESO agrees with various aspects of the clarification provided, which we believe helpful, we nonetheless disagree with a number of the clarifications we deem significantly flawed for reasons noted below and must vote NO to the interpretations:</p> <p>1. The interpretation offered indicated that being part of a RSG is sufficient to meet the obligation of this requirement — we do not agree with this position. Two BAs may engage in a reserve sharing agreement that is designed to offset reserve requirements or to provide support for DCS recover from an incident. However, if the operating agreement does not explicitly address energy assistance under emergency conditions, and the scope and condition of the emergency, emergency energy may not flow. Additionally, reserve sharing agreement addresses the amount of reserve that each participating member needs to carry to meet the overall group and/or individual BAs reserve requirements. Situation can exist that while the shared reserve is used up and a BA is still short of resource, and additional energy delivery is required to take care of the emergency. 2. The SDT indicated that it is OK not to have emergency energy assistance agreements with all adjacent BAs — this is contrary to the NPCC position which dictates that an entity (the responsible BA) must have emergency energy assistance agreements with all adjacent BA entities — this could be either as part of the operating agreement or as a separate explicit agreement by itself. 3. Further, the interpretation precludes adjacent BAs which are connected with only DC ties. It is IESO view that provision of emergency assistance should also be available from areas that are interconnected by DC ties.</p>
<p><b>Response:</b> The drafting team agrees with your comment and proposes to use the NERC Glossary of Terms definition of Adjacent Balancing Authority, which doesn't limit interconnections to AC ties.</p> <p>The intent of the interpretation is to require energy assistance agreements with enough BAs to have sufficient emergency energy assistance agreements to mitigate reasonably anticipated energy emergencies. Having emergency energy assistance agreements with all BAs may exceed what is required to maintain an adequate level of reliability.</p> <p>The technical criteria for establishing what constitutes sufficient emergency assistance should be established through the Standards Development Process.</p>			
2	ISO New England, Inc.	Negative	DC ties should be included in the interpretation, not just AC ties. Agreements with ALL adjacent BAs should be required. Specific Emergency Energy

**Consideration of Comments on Initial ballot RECM Interpretation Request — EOP-001, R1**

Segment	Entity	Ballot	Comments
			Agreements should either be explicit parts of the operating agreements or developed separately and in place as well. Participation in a Reserve Sharing Group may be insufficient to meet Requirement R1 unless such agreement explicitly contains Emergency Energy Agreements among parties.
<p><b>Response:</b> The drafting team agrees with your comment and proposes to use the NERC Glossary of Terms definition of Adjacent Balancing Authority, which doesn't limit interconnections to AC ties.</p> <p>The intent of the interpretation is to require energy assistance agreements with enough BAs to have sufficient emergency energy assistance agreements to mitigate reasonably anticipated energy emergencies. Having emergency energy assistance agreements with all BAs may exceed what is required to maintain an adequate level of reliability.</p> <p>The technical criteria for establishing what constitutes sufficient emergency assistance should be established through the Standards Development Process.</p>			
3	Bonneville Power Administration	Affirmative	Related to the Subcommittee's recommended interpretation #2 BPA suggests the following language changes: An adjacent Balancing Authority is one that has AC and/or DC tie lines in the same interconnection with the responsible BA. We like the interpretation #4 and do want to see it changed.
<p><b>Response:</b> The drafting team agrees with your comment and proposes to use the NERC Glossary of Terms definition of Adjacent Balancing Authority, which doesn't limit interconnections to AC ties.</p>			
3	Consolidated Edison Co. of New York	Negative	DC ties should have been referenced and included in the interpretation, agreements with ALL adjacent BAs should be required. Specific Emergency Energy Agreements should either be explicit parts of the operating agreements or developed separately and in place as well. Also, participation in a Reserve Sharing Group may be insufficient to meet Requirement R1"
<p><b>Response:</b> The drafting team agrees with your comment and proposes to use the NERC Glossary of Terms definition of Adjacent Balancing Authority, which doesn't limit interconnections to AC ties.</p> <p>The intent of the interpretation is to require energy assistance agreements with enough BAs to have sufficient emergency energy assistance agreements to mitigate reasonably anticipated energy emergencies. Having emergency energy assistance agreements with all BAs may exceed what is required to maintain an adequate level of reliability.</p> <p>The technical criteria for establishing what constitutes sufficient emergency assistance should be established through the Standards Development Process.</p>			
3	Consumers Energy	Affirmative	We agree with the intent of the interpretation to Question 4, but suggest it would be unequivocally clear to state: "A Balancing Authority that is compliant with Reliability Standard BAL-002-0, Requirement R2 through participation in a Reserve Sharing Group Agreement shall be deemed to be fully compliant with Requirement R1 of EOP-001-1."
<p><b>Response:</b> Your comment will be submitted to the manager of standards development for inclusion in the Standards "Issues" database as a potential modification to the associated standard.</p>			
3	FirstEnergy Solutions	Affirmative	"FirstEnergy supports the interpretation provided for EOP-001 Requirement R1

**Consideration of Comments on Initial ballot RECM Interpretation Request — EOP-001, R1**

Segment	Entity	Ballot	Comments
			and believes it further clarifies Balancing Authority expectations related to emergency assistance agreements with other Balancing Authorities. It is expected that the standards drafting team working on Project 2008-03 will reference this interpretation when completing revisions to the EOP-001 standard to achieve greater clarity within the standard's requirements and measures. The only question we raise and seek clarification to is in regards to item #2 and we question why the interpretation excludes DC ties when defining an adjacent Balancing Authority? As written, would a Balancing Authority be precluded from obtaining emergency assistance from a BA with whom they may only have DC interconnection(s)? Or, is the intent that a DC tie is considered a remote Balancing Authority and covered by item #3? "
<p><b>Response:</b> The drafting team agrees with your comment and proposes to use the NERC Glossary of Terms definition of Adjacent Balancing Authority, which doesn't limit interconnections to AC ties.</p>			
3	Hydro One Networks, Inc.	Negative	Hydro One Networks Inc. casts a Negative vote with the following comments: 1. DC ties should have been referenced and included in the interpretation. 2. Agreements with ALL adjacent BAs should be required. 3. Specific Emergency Energy Agreements should either be explicit parts of the operating agreements or developed separately and in place as well. 4. Participation in a Reserve Sharing Group may be insufficient to meet Requirement R1.
<p><b>Response:</b> The drafting team agrees with your comment and proposes to use the NERC Glossary of Terms definition of Adjacent Balancing Authority, which doesn't limit interconnections to AC ties.</p>			
<p>The intent of the interpretation is to require energy assistance agreements with enough BAs to have sufficient emergency energy assistance agreements to mitigate reasonably anticipated energy emergencies. Having emergency energy assistance agreements with all BAs may exceed what is required to maintain an adequate level of reliability.</p>			
<p>The technical criteria for establishing what constitutes sufficient emergency assistance should be established through the Standards Development Process.</p>			
3	Louisville Gas and Electric Co.	Affirmative	E.ON US votes YES and wishes to emphasize in our comments the value and importance of Reserve Sharing Groups (RSGs) to first and foremost ensure, reliability on a real-time basis, and also to lower the cost of providing electrical power to our customers. Due to this value, NERC and the Industry should support, encourage and seek expansion of RSGs. Our specific points are as follows. The reliability benefits to the parties of RSGs are: <ul style="list-style-type: none"> <li>- The parties have access to the Contingency Reserve generation capacity of all members on a real time basis and have certainty of emergency energy supply.</li> <li>- The parties utilize a computerized process that immediately dispatches generation and spinning reserves and ten-minute quick-start Contingency Reserves when called upon by a party with a</li> </ul>

Consideration of Comments on Initial ballot RECM Interpretation Request — EOP-001, R1

Segment	Entity	Ballot	Comments
			<p>sudden loss of supply</p> <ul style="list-style-type: none"> <li>- resulting in an immediate response to the supply loss.</li> <li>- The diversity and large number of generating units quickly ramping up to provide emergency power further ensure certainty and an immediate response to the supply loss.</li> <li>- The parties coordinate in advance TRM to ensure that emergency energy for Contingency Reserves can flow in real-time when called on, resulting in certainty of transmission for the flow of emergency energy. The lower cost benefits to the end user customers of the parties of RSGs are:</li> </ul> <ul style="list-style-type: none"> <li>- More efficient use of supply due to reduced Operating Reserves for each BA, despite the size of each BA, in RSGs. (The Midwest ISO has stated that they have conducted studies that have demonstrated that each MW of spinning reserve has a value of \$350,000. Thus, the 300 MW of spinning reserves to be provided at the start of the ASM to the Midwest ISO load by MCRSG parties external to the Midwest ISO footprint equate to approximately \$100 million in annual value. This value will become an annual cost to the Midwest ISO load upon sunset of the MCRSG. This does not include the savings of similar nature to the external BAs.)</li> <li>- The flexibility to transact more energy between BAs with freed-up generation and transmission capacity is achieved even if the Midwest BA grows and the External CRSG BAs decrease to only a few parties.</li> <li>- The advance coordination of TRM reduces the amount of TRM needed. Due to these points, RSGs among BAs, including BAs which are large ISOs operating day ahead and real-time markets along with Operating Reserve markets, should be encouraged. Also, E.ON US</li> <li>- YES vote supports the NERC interpretation that Emergency Assist agreements (EAAs) between interconnected BAs are not required between every interconnect BA to meet NERC Standards. Since the nature of EAAs is for a BA to provide emergency power to a BA, with a supply emergency, immediately or in the near term future (next hour, day or week), E.ON US suggest that NERC should encourage all BAs to file unilateral EAAs at the appropriate rate, MBR or CBR where applicable. Such unilateral filings would establish agreements and rates to provide non-firm emergency power if available after BAs and their associated LSEs have ensured adequate supply to native load and firm transactions (Designated Network Load).</li> </ul>



**Consideration of Comments on Initial ballot RECM Interpretation Request — EOP-001, R1**

Segment	Entity	Ballot	Comments
<b>Response:</b> Your comments will be submitted to the manager of standards development.			
3	New York Power Authority	Negative	DC ties should have been referenced and included in the interpretation agreements with ALL adjacent BAs should be required. Specific Emergency Energy Agreements should either be explicit parts of the operating agreements or developed separately and in place as well. Also, participation in a Reserve Sharing Group may be insufficient to meet Requirement R1.
<p><b>Response:</b> The drafting team agrees with your comment and proposes to use the NERC Glossary of Terms definition of Adjacent Balancing Authority, which doesn't limit interconnections to AC ties.</p> <p>The intent of the interpretation is to require energy assistance agreements with enough BAs to have sufficient emergency energy assistance agreements to mitigate reasonably anticipated energy emergencies. Having emergency energy assistance agreements with all BAs may exceed what is required to maintain an adequate level of reliability.</p> <p>The technical criteria for establishing what constitutes sufficient emergency assistance should be established through the Standards Development Process.</p>			
3	Niagara Mohawk (National Grid Company)	Negative	DC ties should have been referenced and included in the interpretation agreements with ALL adjacent BAs should be required. Specific Emergency Energy Agreements should either be explicit parts of the operating agreements or developed separately and in place as well. Also, participation in a Reserve Sharing Group may be insufficient to meet Requirement R1.
<p><b>Response:</b> The drafting team agrees with your comment and proposes to use the NERC Glossary of Terms definition of Adjacent Balancing Authority, which doesn't limit interconnections to AC ties.</p> <p>The intent of the interpretation is to require energy assistance agreements with enough BAs to have sufficient emergency energy assistance agreements to mitigate reasonably anticipated energy emergencies. Having emergency energy assistance agreements with all BAs may exceed what is required to maintain an adequate level of reliability.</p> <p>The technical criteria for establishing what constitutes sufficient emergency assistance should be established through the Standards Development Process.</p>			
4	Consumers Energy	Affirmative	We agree with the intent of the interpretation to Question 4, but suggest it would be unequivocally clear to state: "A Balancing Authority that is compliant with Reliability Standard BAL-002-0, Requirement R2 through participation in a Reserve Sharing Group Agreement shall be deemed to be fully compliant with Requirement R1 of EOP-001-1."
<b>Response:</b> Your comment will be submitted to the manager of standards development for inclusion in the Standards "Issues" database as a potential modification to the associated standard.			
5	Bonneville Power Administration	Affirmative	BPA agrees in principle with the interpretation with a couple of comments. - With regards to number 2; BPA would recommend the inclusion DC ties and suggests the following language changes: "An adjacent Balancing Authority is one that has AC or DC tie lines in the same interconnection with the responsible BA" This would allow for the inclusion of the Pacific DC intertie

Consideration of Comments on Initial ballot RECM Interpretation Request — EOP-001, R1

Segment	Entity	Ballot	Comments
			between BPA and LADWP. - BPA fully supports interpretation 4. with regards to reserve sharing groups.
<p><b>Response:</b> The drafting team agrees with your comment and proposes to use the NERC Glossary of Terms definition of Adjacent Balancing Authority, which doesn't limit interconnections to AC ties.</p>			
5	Louisville Gas and Electric Co.	Affirmative	<p>E.ON US votes YES and wishes to emphasize in our comments the value and importance of Reserve Sharing Groups (RSGs) to first and foremost ensure, reliability on a real-time basis, and also to lower the cost of providing electrical power to our customers. Due to this value, NERC and the Industry should support, encourage and seek expansion of RSGs. Our specific points are as follows. The reliability benefits to the parties of RSGs are:</p> <ul style="list-style-type: none"> <li>- The parties have access to the Contingency Reserve generation capacity of all members on a real time basis and have certainty of emergency energy supply.</li> <li>- The parties utilize a computerized process that immediately dispatches generation and spinning reserves and ten-minute quick-start Contingency Reserves when called upon by a party with a sudden loss of supply resulting in an immediate response to the supply loss.</li> <li>- The diversity and large number of generating units quickly ramping up to provide emergency power further ensure certainty and an immediate response to the supply loss.</li> <li>- The parties coordinate in advance TRM to ensure that emergency energy for Contingency Reserves can flow in real-time when called on, resulting in certainty of transmission for the flow of emergency energy. The lower cost benefits to the end user customers of the parties of RSGs are:</li> <li>- More efficient use of supply due to reduced Operating Reserves for each BA, despite the size of each BA, in RSGs. (The Midwest ISO has stated that they have conducted studies that have demonstrated that each MW of spinning reserve has a value of \$350,000. Thus, the 300 MW of spinning reserves to be provided at the start of the ASM to the Midwest ISO load by MCRSG parties external to the Midwest ISO footprint equate to approximately \$100 million in annual value. This value will become an annual cost to the Midwest ISO load upon sunset of the MCRSG. This does not include the savings of similar nature to the external BAs.)</li> <li>- The flexibility to transact more energy between BAs with freed-up generation and transmission capacity is achieved even if the Midwest BA grows and the External CRSG BAs decrease to only a few parties.</li> </ul>

Consideration of Comments on Initial ballot RECM Interpretation Request — EOP-001, R1

Segment	Entity	Ballot	Comments
			<ul style="list-style-type: none"> <li>– The advance coordination of TRM reduces the amount of TRM needed. Due to these points, RSGs among BAs, including BAs which are large ISOs operating day ahead and real-time markets along with Operating Reserve markets, should be encouraged. Also, E.ON US</li> <li>– YES vote supports the NERC interpretation that Emergency Assist agreements (EAAs) between interconnected BAs are not required between every interconnect BA to meet NERC Standards. Since the nature of EAAs is for a BA to provide emergency power to a BA, with a supply emergency, immediately or in the near term future (next hour, day or week), E.ON US suggest that NERC should encourage all BAs to file unilateral EAAs at the appropriate rate, MBR or CBR where applicable. Such unilateral filings would establish agreements and rates to provide non-firm emergency power if available after BAs and their associated LSEs have ensured adequate supply to native load and firm transactions (Designated Network Load).</li> </ul>
<p><b>Response:</b> Your comments will be submitted to the manager of standards development.</p>			
6	Bonneville Power Administration	Affirmative	In Item 2, we recommend replacing "AC" with "AC and/or DC tie lines in the same interconnection. "We strongly support the item 4 interpretation regarding reserve sharing groups.
<p><b>Response:</b> The drafting team agrees with your comment and proposes to use the NERC Glossary of Terms definition of Adjacent Balancing Authority, which doesn't limit interconnections to AC ties.</p>			
6	Consolidated Edison Co. of New York	Negative	DC ties should have been referenced and included in the interpretation, agreements with ALL adjacent BAs should be required. Specific Emergency Energy Agreements should either be explicit parts of the operating agreements or developed separately and in place as well. Also, participation in a Reserve Sharing Group may be insufficient to meet Requirement R1.
<p><b>Response:</b> The drafting team agrees with your comment and proposes to use the NERC Glossary of Terms definition of Adjacent Balancing Authority, which doesn't limit interconnections to AC ties.</p>			
<p>The intent of the interpretation is to require energy assistance agreements with enough BAs to have sufficient emergency energy assistance agreements to mitigate reasonably anticipated energy emergencies. Having emergency energy assistance agreements with all BAs may exceed what is required to maintain an adequate level of reliability.</p>			
<p>The technical criteria for establishing what constitutes sufficient emergency assistance should be established through the Standards Development Process.</p>			
6	Entergy Services, Inc.	Affirmative	While we agree with the interpretation, we believe there are some items to consider for clarification if this interpretation must go back for recirculation or re-balloting: Question 1 interpretation: the interpretation should address both a Capacity Emergency and Energy Emergency, as defined in the NERC Glossary. Further clarification to explain that emergency assistance is

**Consideration of Comments on Initial ballot RECM Interpretation Request — EOP-001, R1**

Segment	Entity	Ballot	Comments
			<p>applicable to both situations (capacity, energy or both) will minimize any confusion in the requirement and interpretation. (note —“ there appears to be little, if any difference in the definition of the terms; further clarification of the terms or eliminating one of the terms/consolidating the terms this would be an area for improvement in the NERC Standards) Question 2 interpretation: the interpretation should use the approved term from the NERC Glossary: Adjacent Balancing Authority Question 3 interpretation: the term “emergency assistance, as defined in Question 1 should be used in lieu of “emergency energy assistance,” or alternatively use the NERC Glossary terms Capacity Emergency and Energy Emergency Question 4 interpretation: the interpretation should specify that RSG agreements may be used if they contain provisions for use during a Capacity Emergency or Energy Emergency</p>
<p><b>Response:</b> Your comments will be submitted to the manager of standards development for inclusion in the Standards “Issues” database as a potential modification to the associated standard.</p>			
6	FirstEnergy Solutions	Affirmative	<p>FirstEnergy supports the interpretation provided for EOP-001 Requirement R1 and believes it further clarifies Balancing Authority expectations related to emergency assistance agreements with other Balancing Authorities. It is expected that the standards drafting team working on Project 2008-03 will reference this interpretation when completing revisions to the EOP-001 standard to achieve greater clarity within the standard's requirements and measures. The only question we raise and seek clarification to is in regards to item #2 and we question why the interpretation excludes DC ties when defining an adjacent Balancing Authority? As written, would a Balancing Authority be precluded from obtaining emergency assistance from a BA with whom they may only have DC interconnection(s)? Or, is the intent that a DC tie is considered a remote Balancing Authority and covered by item #3?</p>
<p><b>Response:</b> The drafting team agrees with your comment and proposes to use the NERC Glossary of Terms definition of Adjacent Balancing Authority, which doesn't limit interconnections to AC ties.</p>			
6	Louisville Gas and Electric Co.	Affirmative	<p>E.ON US votes YES and wishes to emphasize in our comments the value and importance of Reserve Sharing Groups (RSGs) to first and foremost ensure, reliability on a real-time basis, and also to lower the cost of providing electrical power to our customers. Due to this value, NERC and the Industry should support, encourage and seek expansion of RSGs. Our specific points are as follows. The reliability benefits to the parties of RSGs are:</p> <ul style="list-style-type: none"> <li>– The parties have access to the Contingency Reserve generation capacity of all members on a real time basis and have certainty of emergency energy supply.</li> <li>– The parties utilize a computerized process that immediately dispatches generation and spinning reserves and ten-minute quick-</li> </ul>

Consideration of Comments on Initial ballot RECM Interpretation Request — EOP-001, R1

Segment	Entity	Ballot	Comments
			<p>start Contingency Reserves when called upon by a party with a sudden loss of supply resulting in an immediate response to the supply loss.</p> <ul style="list-style-type: none"> <li>- The diversity and large number of generating units quickly ramping up to provide emergency power further ensure certainty and an immediate response to the supply loss.</li> <li>- The parties coordinate in advance TRM to ensure that emergency energy for Contingency Reserves can flow in real-time when called on, resulting in certainty of transmission for the flow of emergency energy. The lower cost benefits to the end user customers of the parties of RSGs are:</li> <li>- More efficient use of supply due to reduced Operating Reserves for each BA, despite the size of each BA, in RSGs. (The Midwest ISO has stated that they have conducted studies that have demonstrated that each MW of spinning reserve has a value of \$350,000. Thus, the 300 MW of spinning reserves to be provided at the start of the ASM to the Midwest ISO load by MCRSG parties external to the Midwest ISO footprint equate to approximately \$100 million in annual value. This value will become an annual cost to the Midwest ISO load upon sunset of the MCRSG. This does not include the savings of similar nature to the external BAs.)</li> <li>- The flexibility to transact more energy between BAs with freed-up generation and transmission capacity is achieved even if the Midwest BA grows and the External CRSG BAs decrease to only a few parties.</li> <li>- The advance coordination of TRM reduces the amount of TRM needed.</li> </ul>
<p><b>Response:</b> Your comments will be submitted to the manager of standards development.</p>			
9	Commonwealth of Massachusetts Department of Public Utilities	Negative	<p>Interpreters should:</p> <ol style="list-style-type: none"> <li>1) reconsider inclusion of BAs with DC ties, or explain why BAs with DC ties should be excluded;</li> <li>2) specify that Reserve Sharing Agreements have provisions addressing emergency assistance and that there be a demonstration that the Reserve Sharing Agreement is sufficient to mitigate reasonably anticipated energy emergencies; and,</li> <li>3) reconsider requiring that BAs have agreements with all adjacent BAs or explain why an agreement with one adjacent BA is sufficient under the Requirement 1 language.</li> </ol>
<p><b>Response:</b> The drafting team agrees with your comment and proposes to use the NERC Glossary of Terms definition of Adjacent Balancing Authority, which doesn't limit interconnections to AC ties.</p>			

**Consideration of Comments on Initial ballot RECM Interpretation Request — EOP-001, R1**

Segment	Entity	Ballot	Comments
<p>The intent of the interpretation is to require energy assistance agreements with enough BAs to have sufficient emergency energy assistance agreements to mitigate reasonably anticipated energy emergencies. Having emergency energy assistance agreements with all BAs may exceed what is required to maintain an adequate level of reliability.</p>			
<p>The technical criteria for establishing what constitutes sufficient emergency assistance should be established through the Standards Development Process.</p>			
9	National Association of Regulatory Utility Commissioners	Negative	<p>Interpreters should: 1) reconsider inclusion of BAs with DC ties, or explain why BAs with DC ties should be excluded; 2) specify that Reserve Sharing Agreements have provisions addressing emergency assistance and that there be a demonstration that the Reserve Sharing Agreement is sufficient to mitigate reasonably anticipated energy emergencies; and, 3) reconsider requiring that BAs have agreements with all adjacent BAs or explain why an agreement with one adjacent BA is sufficient under the Requirement 1 language.</p>
<p><b>Response:</b> The drafting team agrees with your comment and proposes to use the NERC Glossary of Terms definition of Adjacent Balancing Authority, which doesn't limit interconnections to AC ties.</p>			
<p>The intent of the interpretation is to require energy assistance agreements with enough BAs to have sufficient emergency energy assistance agreements to mitigate reasonably anticipated energy emergencies. Having emergency energy assistance agreements with all BAs may exceed what is required to maintain an adequate level of reliability.</p>			
<p>The technical criteria for establishing what constitutes sufficient emergency assistance should be established through the Standards Development Process.</p>			
10	Northeast Power Coordinating Council, Inc.	Negative	<p>DC tie lines should have been included in the interpretation. Agreements with all adjacent BAs should be required. Participation in a Reserve Sharing Group is insufficient to meet Requirement R1, unless the Reserve Sharing Group agreement contains emergency assistance provisions.</p>
<p><b>Response:</b> The drafting team agrees with your comment and proposes to use the NERC Glossary of Terms definition of Adjacent Balancing Authority, which doesn't limit interconnections to AC ties.</p>			
<p>The intent of the interpretation is to require energy assistance agreements with enough BAs to have sufficient emergency energy assistance agreements to mitigate reasonably anticipated energy emergencies. Having emergency energy assistance agreements with all BAs may exceed what is required to maintain an adequate level of reliability.</p>			
<p>The technical criteria for establishing what constitutes sufficient emergency assistance should be established through the Standards Development Process.</p>			

## Standards Announcement Two Recirculation Ballots January 6–15, 2009

Now available at: <https://standards.nerc.net/CurrentBallots.aspx>

**Recirculation ballot windows for the following projects are now open until 8 p.m. EST on January 15, 2009:**

### **Interpretation of EOP-001-0 Requirement R1 for Regional Entity Compliance Managers (Project 2008-09)**

The Regional Entity Compliance Managers group submitted a Request for an Interpretation of EOP-001-0 — Emergency Operations Planning Requirement R1. Under Requirement R1, the Balancing Authority must have operating agreements with adjacent Balancing Authorities that contain provisions for emergency assistance, including emergency assistance from remote Balancing Authorities. The request asked for the following clarifications:

- Define the scope and time horizon associated with “emergency assistance.”
- Does “adjacent Balancing Authority” mean one or all adjacent Balancing Authorities?
- What is a “remote Balancing Authority?”
- Does a Balancing Authority participating in a Reserve Sharing Group under BAL-002-0 need additional operating agreements to be compliant with EOP-001-0 Requirement R1?

This version of interpretation includes edits to the version posted for initial ballot. The request and interpretation are posted on the following page: <http://www.nerc.com/filez/standards/EOP-001-0 Interpretation RECM.html>

### **Interpretation of VAR-002-1a — Generator Operation for Maintaining Network Voltage Schedules (Project 2008-11)**

ICF Consulting submitted a formal Request for Interpretation, which asked for the following clarifications:

- Which requirements in VAR-002 apply to Generator Operators that operate generators that do not have automatic voltage regulation (AVR) capability?
- Does the standard require a Generator Owner to acquire AVR devices to comply with the requirements in this standard?

The interpretation provides the following clarifications:



- All the requirements and associated subrequirements in VAR-002-1a apply to Generator Owners and Generator Operators that own or operate generators whether equipped with an automatic voltage regulator or not.
- There are no requirements in the standard that require a generator to have an automatic voltage regulator, nor are there any requirements for a Generator Owner to modify its generator to add an automatic voltage regulator.

The request and interpretation are posted on the following page:

[http://www.nerc.com/filez/standards/Project2008-11\\_VAR-002\\_Interpretation.html](http://www.nerc.com/filez/standards/Project2008-11_VAR-002_Interpretation.html)

### **Recirculation Ballot Process**

The Standards Committee encourages all members of the Ballot Pool to review the consideration of comments submitted with the initial ballots. In the recirculation ballot, votes are counted by exception only — if a Ballot Pool member does not submit a revision to that member's original vote, the vote remains the same as in the first ballot. Members of the ballot pool may:

- Reconsider and change their vote from the first ballot.
- Vote in the second ballot even if they did not vote on the first ballot.
- Take no action if they do not want to change their original vote.

### **Standards Development Process**

The [Reliability Standards Development Procedure](#) contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate.

*For more information or assistance,  
please contact Shaun Streeter at [shaun.streeter@nerc.net](mailto:shaun.streeter@nerc.net) or at 609.452.8060.*





NORTH AMERICAN ELECTRIC  
RELIABILITY CORPORATION

April 2, 2008

Maureen Long  
Standards Process Manager  
North American Electric Reliability Corporation  
116-390 Village Blvd.  
Princeton, NJ 08540

**Re: Formal Interpretation Request for Reliability Standard EOP-001-0, Requirement 1**

Dear Maureen,

The Regional Entity Compliance Managers (RECM) request a formal interpretation of Reliability Standard EOP-001-0 — Emergency Operations Planning Requirement R1 in accordance with the Reliability Standards Development Procedure.

Material Impact: A formal interpretation is required for Regional Entities to consistently assess compliance with this standard and to ensure Registered Entities are meeting their obligation and responsibility as intended by the standard.

Clarification is needed for Reliability Standard EOP-001-0 Requirement R1 which states:

- R1.** Balancing Authorities shall have operating agreements with adjacent Balancing Authorities that shall, at a minimum, contain provisions for emergency assistance, including provisions to obtain emergency assistance from remote Balancing Authorities.

Specifically, the RECM requests an interpretation and clarity for the following language listed in EOP-001-0, Requirement 1:

1. What is the definition of emergency assistance in the context of this standard? What scope and time horizons, if any, are considered necessary in this definition?
2. What was intended by using the adjective “adjacent” in Requirement 1? Does “adjacent” Balancing Authorities mean “All” or something else? Is there qualifying criteria to determine if a very small adjacent Balancing Authority area has enough capacity to offer emergency assistance?
3. What is the definition of the word “remote” as stated in the last phrase of Requirement 1? Does remote mean every Balancing Authority who’s area does not physically touch the Balancing Authority attempting to comply with this Requirement?

4. Would a Balancing Authority that participates in a Reserve Sharing Group Agreement, which meets the requirements of Reliability Standard BAL-002-0, Requirement 2, be required to establish additional operating agreements to achieve compliance with Reliability Standard EOP-001-0, Requirement 1?

If you have any questions concerning this request please contact Susan Morris, Manager of Regional Compliance Program Oversight at [susan.morris@nerc.net](mailto:susan.morris@nerc.net) or (609) 240-6784.

Sincerely,

Regional Entity Compliance Managers:

Barry Pagel, Florida Reliability Coordinating Council  
Stanley Kopman, Northeast Power Coordinating Council  
Wayne VanOsdol, Midwest Reliability Organization  
Ray Palmieri, ReliabilityFirst Corporation  
Tom Galloway, SERC Reliability Corporation  
Ron Ciesiel, Southwest Power Pool Regional Entity  
Mark Henry, Texas Regional Entity  
Steve McCoy, Western Electricity Coordinating Council

CC: David Taylor  
Gerry Adamski  
Regional Entity Compliance Monitoring Group  
Compliance Department

## Revised Interpretation of EOP-001-0 Emergency Operations Planning Requirement R1 for the Regional Entity Compliance Managers

Request for Interpretation Received from Regional Entity Compliance Managers on March 20, 2008:

### Request:

*The Regional Entity Compliance Managers (RECM) request a formal interpretation of Reliability Standard EOP-001-0 — Emergency Operations Planning Requirement R1 in accordance with the Reliability Standards Development Procedure.*

- 1. What is the definition of emergency assistance in the context of this standard? What scope and time horizons, if any, are considered necessary in this definition?*
- 2. What was intended by using the adjective “adjacent” in Requirement 1? Does “adjacent Balancing Authorities” mean “All” or something else? Is there qualifying criteria to determine if a very small adjacent Balancing Authority area has enough capacity to offer emergency assistance?*
- 3. What is the definition of the word “remote” as stated in the last phrase of Requirement 1? Does remote mean every Balancing Authority who’s area does not physically touch the Balancing Authority attempting to comply with this Requirement?*
- 4. Would a Balancing Authority that participates in a Reserve Sharing Group Agreement, which meets the requirements of Reliability Standard BAL-002-0, Requirement 2, have to establish additional operating agreements to achieve compliance with Reliability Standard EOP-001-0, Requirement 1?*

### **EOP-001-0**

**R1. Balancing Authorities shall have operating agreements with adjacent Balancing Authorities that shall, at a minimum, contain provisions for emergency assistance, including provisions to obtain emergency assistance from remote Balancing Authorities.**

The following revised interpretation of EOP-001-0 — Emergency Operations Planning Requirement R1 was developed by the Executive Committee of the NERC Operating Reliability Subcommittee:

### Interpretation of EOP-001-0 Requirement R1:

1. In the context of this standard, emergency assistance is emergency energy. Emergency energy would normally be arranged for during the current operating day. The agreement should describe the conditions under which the emergency energy will be delivered to the responsible Balancing Authority.
2. The intent is that all Balancing Authorities have emergency energy assistance agreements with at least one Adjacent Balancing Authority and have sufficient emergency energy assistance agreements to mitigate reasonably anticipated energy emergencies. However,

the standard does not require emergency energy assistance agreements with all Adjacent Balancing Authorities.

3. A remote Balancing Authority is a Balancing Authority other than an Adjacent Balancing Authority. The responsible Balancing Authority is not required to have arrangements in place to obtain emergency energy assistance with all remote Balancing Authorities. The responsible Balancing Authority's agreement(s) with the Adjacent Balancing Authorities does (do) not preclude the Adjacent Balancing Authority from purchasing emergency energy from remote Balancing Authorities on behalf of the responsible Balancing Authority.
4. A Balancing Authority that is compliant with Reliability Standard BAL-002-0, Requirement R2 through participation in a Reserve Sharing Group Agreement is not required to establish additional operating agreements as described in Requirement R1 of EOP-001-0.

**Revised Interpretation of EOP-001-0 Emergency Operations Planning Requirement R1 for the Regional Entity Compliance Managers**

**Request for Interpretation Received from Regional Entity Compliance Managers on March 20, 2008:**

**Request:**

*The Regional Entity Compliance Managers (RECM) request a formal interpretation of Reliability Standard EOP-001-0 — Emergency Operations Planning Requirement R1 in accordance with the Reliability Standards Development Procedure.*

- 1. What is the definition of emergency assistance in the context of this standard? What scope and time horizons, if any, are considered necessary in this definition?*
- 2. What was intended by using the adjective “adjacent” in Requirement 1? Does “adjacent Balancing Authorities” mean “All” or something else? Is there qualifying criteria to determine if a very small adjacent Balancing Authority area has enough capacity to offer emergency assistance?*
- 3. What is the definition of the word “remote” as stated in the last phrase of Requirement 1? Does remote mean every Balancing Authority who’s area does not physically touch the Balancing Authority attempting to comply with this Requirement?*
- 4. Would a Balancing Authority that participates in a Reserve Sharing Group Agreement, which meets the requirements of Reliability Standard BAL-002-0, Requirement 2, have to establish additional operating agreements to achieve compliance with Reliability Standard EOP-001-0, Requirement 1?*

**EOP-001-0**

**R1. Balancing Authorities shall have operating agreements with adjacent Balancing Authorities that shall, at a minimum, contain provisions for emergency assistance, including provisions to obtain emergency assistance from remote Balancing Authorities.**

The following revised interpretation of EOP-001-0 — Emergency Operations Planning Requirement R1 was developed by the Executive Committee of the NERC Operating Reliability Subcommittee **on May 9, 2008:**

**Interpretation of EOP-001-0 Requirement R1:**

1. In the context of this standard, emergency assistance is emergency energy. Emergency energy would normally be arranged for during the current operating day. The agreement should describe the conditions under which the emergency energy will be delivered to the responsible Balancing Authority.
2. ~~An adjacent Balancing Authority is one that has AC tie lines with the responsible Balancing Authority. The standard does not require emergency energy assistance agreements with all adjacent Balancing Authorities.~~The intent is that all Balancing Authorities have emergency

- energy assistance agreements with at least one ~~adjacent~~Adjacent Balancing Authority and have sufficient emergency energy assistance agreements to mitigate reasonably anticipated energy emergencies. However, the standard does not require emergency energy assistance agreements with all Adjacent Balancing Authorities.
3. A remote Balancing Authority is a Balancing Authority other than an ~~adjacent~~Adjacent Balancing Authority. The responsible Balancing Authority is not required to have arrangements in place to obtain emergency energy assistance with all remote Balancing Authorities. The responsible Balancing Authority's agreement(s) with the ~~adjacent~~Adjacent Balancing Authorities does (do) not preclude the ~~adjacent~~Adjacent Balancing Authority from purchasing emergency energy from remote Balancing Authorities on behalf of the responsible Balancing Authority.
  4. A Balancing Authority that is compliant with Reliability Standard BAL-002-0, Requirement R2 through participation in a Reserve Sharing Group Agreement is not required to establish additional operating agreements as described in Requirement R1 of EOP-001-0.

## Standards Announcement

### Ballot Pool and Pre-ballot Window

January 28–February 26, 2009

Now available at: <https://standards.nerc.net/BallotPool.aspx>

#### **Revised Interpretation of EOP-001-0 Requirement R1 for Regional Entity Compliance Managers (Project 2008-09)**

The **revised** interpretation of EOP-001-0 Requirement R1 for the Regional Entity Compliance Managers is posted for a 30-day pre-ballot review. Registered Ballot Body members may join the ballot pool to be eligible to vote on these revisions **until 8 a.m. EST on February 26, 2009**.

After the initial ballot, the drafting team made some significant modifications to clarify the interpretation. We continued to a recirculation ballot in error – because the modifications were significant, the revised interpretation should have been posted for a new 30-day pre-ballot review. This posting corrects that error, and a new ballot will be conducted following the 30-day pre-ballot window. The 30-day pre-ballot review includes the formation of a new ballot pool.

The revised interpretation uses the term “Adjacent Balancing Authority” as defined in the *NERC Glossary of Terms Used in Reliability Standards*. The changes to the interpretation are shown in the redline version of the interpretation posted for review.

During the pre-ballot window, members of the ballot pool may communicate with one another by using their "ballot pool list server." (Once the balloting begins, ballot pool members are prohibited from using the ballot pool list servers.) The list server for this ballot pool is: bp-RFI\_EOP-001-0\_RECM\_in.

#### **Background**

The Regional Entity Compliance Managers group submitted a request for interpretation for EOP-001-0 — Emergency Operations Planning Requirement R1. Under Requirement R1, the Balancing Authority must have operating agreements with adjacent Balancing Authorities that contain provisions for emergency assistance, including emergency assistance from remote Balancing Authorities. The request asked for the following clarifications:

- Define the scope and time horizon associated with “emergency assistance.”
- Does “adjacent Balancing Authority” mean one or all adjacent Balancing Authorities?
- What is a “remote Balancing Authority?”

- Does a Balancing Authority participating in a Reserve Sharing Group under BAL-002-0 need additional operating agreements to be compliant with EOP-001-0 Requirement R1

Project Page: [http://www.nerc.com/filez/standards/EOP-001-0\\_Interpretation\\_RECM.html](http://www.nerc.com/filez/standards/EOP-001-0_Interpretation_RECM.html)

### **Standards Development Process**

The [Reliability Standards Development Procedure](#) contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate.

*For more information or assistance,  
please contact Shaun Streeter at [shaun.streeter@nerc.net](mailto:shaun.streeter@nerc.net) or at 609.452.8060.*







NORTH AMERICAN ELECTRIC  
RELIABILITY CORPORATION

## Standards Announcement

Initial Ballot Window Open

February 27–March 9, 2009

Now available at: <https://standards.nerc.net/CurrentBallots.aspx>

### **Revised Interpretation of EOP-001-0 Requirement R1 for Regional Entity Compliance Managers (Project 2008-09)**

An initial ballot window for a revised interpretation of EOP-001-0 — Emergency Operations Planning Requirement R1 for the Regional Entity Compliance Managers is now open **until 8 p.m. EDT on March 9, 2009**.

#### **Background**

The Regional Entity Compliance Managers group submitted a request for interpretation for EOP-001-0 Requirement R1. Under Requirement R1, the Balancing Authority must have operating agreements with adjacent Balancing Authorities that contain provisions for emergency assistance, including emergency assistance from remote Balancing Authorities. The request asked for clarification on specific terminology and the applicability of Reserve Sharing Group Agreements. The revised interpretation uses the term “Adjacent Balancing Authority” as defined in the *NERC Glossary of Terms Used in Reliability Standards*. The changes to the interpretation are shown in the redline version of the interpretation posted for review.

Project Page: <http://www.nerc.com/filez/standards/EOP-001-0 Interpretation RECM.html>

#### **Standards Development Process**

The [Reliability Standards Development Procedure](#) contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate.

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- Registered Ballot Body
- Proxy Voters

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Ballot Results	
<b>Ballot Name:</b>	Request for Interpretation - EOP-001-0 - RECM_in
<b>Ballot Period:</b>	2/27/2009 - 3/9/2009
<b>Ballot Type:</b>	Initial
<b>Total # Votes:</b>	165
<b>Total Ballot Pool:</b>	184
<b>Quorum:</b>	<b>89.67 % The Quorum has been reached</b>
<b>Weighted Segment Vote:</b>	89.03 %
<b>Ballot Results:</b>	<b>The standard will proceed to recirculation ballot.</b>

Summary of Ballot Results									
Segment	Ballot Pool	Segment Weight	Affirmative		Negative		Abstain # Votes	No Vote	
			# Votes	Fraction	# Votes	Fraction			
1 - Segment 1.		56	1	45	0.938	3	0.063	1	7
2 - Segment 2.		9	0.8	4	0.4	4	0.4	0	1
3 - Segment 3.		45	1	39	0.975	1	0.025	0	5
4 - Segment 4.		13	1	11	0.917	1	0.083	0	1
5 - Segment 5.		34	1	29	0.935	2	0.065	1	2
6 - Segment 6.		17	1	15	1	0	0	0	2
7 - Segment 7.		0	0	0	0	0	0	0	0
8 - Segment 8.		2	0.2	2	0.2	0	0	0	0
9 - Segment 9.		2	0.2	2	0.2	0	0	0	0
10 - Segment 10.		6	0.5	4	0.4	1	0.1	0	1
<b>Totals</b>		<b>184</b>	<b>6.7</b>	<b>151</b>	<b>5.965</b>	<b>12</b>	<b>0.736</b>	<b>2</b>	<b>19</b>

Individual Ballot Pool Results				
Segment	Organization	Member	Ballot	Comments
1	Ameren Services	Kirit S. Shah	Affirmative	
1	American Electric Power	Paul B. Johnson	Affirmative	
1	American Transmission Company, LLC	Jason Shaver	Affirmative	
1	Associated Electric Cooperative, Inc.	John Bussman	Affirmative	
1	Austin Energy	James Armke	Negative	<a href="#">View</a>
1	Avista Corp.	Scott Kinney		
1	BC Transmission Corporation	Gordon Rawlings	Affirmative	
1	Bonneville Power Administration	Donald S. Watkins	Affirmative	

1	Brazos Electric Power Cooperative, Inc.	Tony Kroskey	Affirmative	
1	CenterPoint Energy	Paul Rocha	Negative	<a href="#">View</a>
1	Central Maine Power Company	Brian Conroy		
1	City of Tacoma, Department of Public Utilities, Light Division, dba Tacoma Power	Alan L Cooke	Affirmative	
1	Consolidated Edison Co. of New York	Christopher L de Graffenried	Affirmative	
1	Dominion Virginia Power	William L. Thompson	Affirmative	
1	Duke Energy Carolina	Douglas E. Hils	Affirmative	
1	E.ON U.S. LLC	Larry Monday	Affirmative	
1	Entergy Corporation	George R. Bartlett		
1	Exelon Energy	John J. Blazekovich	Affirmative	
1	Farmington Electric Utility System	Alan Glazner	Affirmative	
1	FirstEnergy Energy Delivery	Robert Martinko	Affirmative	<a href="#">View</a>
1	Florida Keys Electric Cooperative Assoc.	Dennis Minton		
1	Florida Power & Light Co.	C. Martin Mennes	Affirmative	
1	Great River Energy	Gordon Pietsch	Affirmative	
1	Hoosier Energy Rural Electric Cooperative, Inc.	Damon Holladay		
1	Hydro One Networks, Inc.	Ajay Garg	Affirmative	
1	ITC Transmission	Elizabeth Howell	Affirmative	
1	Kansas City Power & Light Co.	Michael Gammon	Affirmative	
1	Kissimmee Utility Authority	Joe B Watson	Negative	
1	Manitoba Hydro	Michelle Rheault	Affirmative	
1	MEAG Power	Danny Dees	Affirmative	
1	Minnesota Power, Inc.	Carol Gerou	Affirmative	
1	National Grid	Michael J Ranalli	Affirmative	
1	New York Power Authority	Ralph Rufrano	Affirmative	
1	Northeast Utilities	David H. Boguslawski	Abstain	
1	Orlando Utilities Commission	Brad Chase	Affirmative	
1	Otter Tail Power Company	Lawrence R. Larson	Affirmative	
1	Pacific Gas and Electric Company	Chifong L. Thomas	Affirmative	
1	PacifiCorp	Robert Williams		
1	Potomac Electric Power Co.	Richard J. Kafka	Affirmative	
1	PowerSouth Energy Cooperative	Larry D Avery	Affirmative	
1	PP&L, Inc.	Ray Mammarella		
1	Progress Energy Carolinas	Sammy Roberts	Affirmative	
1	Public Service Electric and Gas Co.	Kenneth D. Brown	Affirmative	
1	Puget Sound Energy, Inc.	Catherine Koch	Affirmative	
1	Salt River Project	Robert Kondziolka	Affirmative	
1	Santee Cooper	Terry L. Blackwell	Affirmative	
1	SaskPower	Wayne Guttormson	Affirmative	
1	Seattle City Light	Pawel Krupa	Affirmative	
1	Sierra Pacific Power Co.	Richard Salgo	Affirmative	
1	South Texas Electric Cooperative	Richard McLeon	Affirmative	
1	Southern California Edison Co.	Dana Cabbell	Affirmative	
1	Southern Company Services, Inc.	Horace Stephen Williamson	Affirmative	
1	Southwest Transmission Cooperative, Inc.	James L. Jones	Affirmative	
1	Tucson Electric Power Co.	John Tolo	Affirmative	
1	Westar Energy	Allen Klassen	Affirmative	
1	Western Area Power Administration	Brandy A Dunn	Affirmative	
2	Alberta Electric System Operator	Anita Lee	Affirmative	
2	British Columbia Transmission Corporation	Phil Park	Affirmative	
2	California ISO	David Hawkins	Affirmative	
2	Electric Reliability Council of Texas, Inc.	Roy D. McCoy	Negative	<a href="#">View</a>
2	Independent Electricity System Operator	Kim Warren	Negative	<a href="#">View</a>
2	Midwest ISO, Inc.	Terry Bilke		
2	New Brunswick System Operator	Alden Briggs	Negative	<a href="#">View</a>
2	New York Independent System Operator	Gregory Campoli	Negative	<a href="#">View</a>
2	PJM Interconnection, L.L.C.	Tom Bowe	Affirmative	
3	Alabama Power Company	Robin Hurst	Affirmative	
3	Ameren Services	Mark Peters	Affirmative	
3	American Electric Power	Raj Rana	Affirmative	
3	Atlantic City Electric Company	James V. Petrella	Affirmative	
3	Avista Corp.	Robert Lafferty		
3	Bonneville Power Administration	Rebecca Berdahl	Affirmative	
3	City Public Service of San Antonio	Edwin Les Barrow		
3	Cloverland Electric Cooperative	Daniel M Dasho	Affirmative	

3	Consumers Energy	David A. Lapinski	Affirmative	
3	Cowlitz County PUD	Russell A Noble	Affirmative	
3	Delmarva Power & Light Co.	Michael R. Mayer	Affirmative	
3	Detroit Edison Company	Kent Kujala	Affirmative	
3	Dominion Resources, Inc.	Jalal (John) Babik	Affirmative	
3	Duke Energy Carolina	Henry Ernst-Jr	Affirmative	
3	FirstEnergy Solutions	Joanne Kathleen Borrell	Affirmative	<a href="#">View</a>
3	Florida Power & Light Co.	W. R. Schoneck	Affirmative	
3	Florida Power Corporation	Lee Schuster	Affirmative	
3	Georgia Power Company	Leslie Sibert	Affirmative	
3	Georgia System Operations Corporation	Edward W Pourciau	Affirmative	
3	Grays Harbor PUD	Wesley W Gray	Affirmative	
3	Great River Energy	Sam Kokkinen	Affirmative	
3	Gulf Power Company	Gwen S Frazier	Affirmative	
3	Hydro One Networks, Inc.	Michael D. Penstone	Affirmative	
3	JEA	Garry Baker		
3	Kansas City Power & Light Co.	Charles Locke	Affirmative	
3	Lakeland Electric	Mace Hunter	Affirmative	
3	Louisville Gas and Electric Co.	Charles A. Freibert	Affirmative	
3	MidAmerican Energy Co.	Thomas C. Mielnik	Affirmative	
3	Mississippi Power	Don Horsley	Affirmative	
3	New York Power Authority	Michael Lupo	Affirmative	
3	Niagara Mohawk (National Grid Company)	Michael Schiavone	Affirmative	
3	Orlando Utilities Commission	Ballard Keith Mutters	Affirmative	
3	PacifiCorp	John Apperson	Affirmative	
3	Platte River Power Authority	Terry L Baker	Affirmative	
3	Potomac Electric Power Co.	Robert Reuter	Affirmative	
3	Progress Energy Carolinas	Sam Waters	Affirmative	
3	Public Service Electric and Gas Co.	Jeffrey Mueller	Affirmative	
3	Salt River Project	John T. Underhill	Affirmative	
3	San Diego Gas & Electric	Scott Peterson		
3	Santee Cooper	Zack Dusenbury	Affirmative	
3	Seattle City Light	Dana Wheelock	Affirmative	
3	Southern California Edison Co.	David Schiada		
3	Tampa Electric Co.	Ronald L. Donahey	Affirmative	
3	Wisconsin Electric Power Marketing	James R. Keller	Negative	<a href="#">View</a>
3	Xcel Energy, Inc.	Michael Ibold	Affirmative	
4	Alliant Energy Corp. Services, Inc.	Kenneth Goldsmith	Affirmative	
4	Consumers Energy	David Frank Ronk	Affirmative	
4	Detroit Edison Company	Daniel Herring	Affirmative	
4	Florida Municipal Power Agency	Thomas Reedy		
4	Georgia System Operations Corporation	Guy Andrews	Affirmative	
4	Madison Gas and Electric Co.	Joseph G. DePoorter	Affirmative	
4	Northern California Power Agency	Fred E. Young	Affirmative	
4	Ohio Edison Company	Douglas Hohlbaugh	Affirmative	<a href="#">View</a>
4	Public Utility District No. 1 of Douglas County	Henry E. LuBean	Affirmative	
4	Sacramento Municipal Utility District	Dilip Mahendra	Affirmative	
4	Seattle City Light	Hao Li	Affirmative	
4	Seminole Electric Cooperative, Inc.	Steven R. Wallace	Affirmative	
4	Wisconsin Energy Corp.	Anthony Jankowski	Negative	<a href="#">View</a>
5	AEP Service Corp.	Brock Ondayko	Affirmative	
5	Amerenue	Sam Dwyer	Affirmative	
5	Avista Corp.	Edward F. Groce	Abstain	
5	BC Hydro and Power Authority	Clement Ma	Affirmative	
5	Bonneville Power Administration	Francis J. Halpin	Affirmative	
5	City of Tallahassee	Alan Gale	Affirmative	
5	Colmac Clarion/Piney Creek LP	Harvie D. Beavers	Affirmative	
5	CPS Energy	Robert B Stevens		
5	Dairyland Power Coop.	Warren Schaefer	Affirmative	
5	Detroit Edison Company	Ronald W. Bauer	Affirmative	
5	Dominion Resources, Inc.	Mike Garton	Affirmative	
5	Entergy Corporation	Stanley M Jaskot	Negative	<a href="#">View</a>
5	FirstEnergy Solutions	Kenneth Dresner	Affirmative	<a href="#">View</a>
5	Great River Energy	Cynthia E Sulzer	Affirmative	
5	Kansas City Power & Light Co.	Scott Heidtbrink	Affirmative	
5	Lincoln Electric System	Dennis Florom	Affirmative	
5	Louisville Gas and Electric Co.	Charlie Martin	Affirmative	

5	Manitoba Hydro	Mark Aikens	Affirmative	
5	New York Power Authority	Gerald Mannarino	Affirmative	
5	Northern States Power Co.	Liam Noailles	Affirmative	
5	Oklahoma Gas and Electric Co.	Kim Morphis	Affirmative	
5	Orlando Utilities Commission	Richard Kinan	Affirmative	<a href="#">View</a>
5	PacifiCorp Energy	David Godfrey	Affirmative	
5	PPL Generation LLC	Mark A. Heimbach	Affirmative	
5	Progress Energy Carolinas	Wayne Lewis	Affirmative	
5	PSEG Power LLC	Thomas Piascik	Affirmative	
5	Reliant Energy Services	Thomas J. Bradish	Affirmative	
5	Salt River Project	Glen Reeves	Affirmative	
5	Seattle City Light	Michael J. Haynes	Affirmative	
5	Seminole Electric Cooperative, Inc.	Brenda K. Atkins	Affirmative	
5	Southeastern Power Administration	Douglas Spencer	Affirmative	
5	U.S. Army Corps of Engineers Northwestern Division	Karl Bryan	Affirmative	
5	U.S. Bureau of Reclamation	Martin Bauer		
5	Wisconsin Electric Power Co.	Linda Horn	Negative	<a href="#">View</a>
6	AEP Marketing	Edward P. Cox	Affirmative	
6	Ameren Energy Marketing Co.	Jennifer Richardson	Affirmative	
6	Bonneville Power Administration	Brenda S. Anderson	Affirmative	
6	Consolidated Edison Co. of New York	Nickesha P Carrol		
6	Dominion Resources, Inc.	Louis S Slade		
6	Duke Energy Carolina	Walter Yeager	Affirmative	
6	FirstEnergy Solutions	Mark S Travaglianti	Affirmative	<a href="#">View</a>
6	Louisville Gas and Electric Co.	Daryn Barker	Affirmative	
6	Manitoba Hydro	Daniel Prowse	Affirmative	
6	New York Power Authority	Thomas Papadopoulos	Affirmative	
6	Northern Indiana Public Service Co.	Joseph O'Brien	Affirmative	
6	Progress Energy	James Eckelkamp	Affirmative	
6	PSEG Energy Resources & Trade LLC	James D. Hebson	Affirmative	
6	Salt River Project	Mike Hummel	Affirmative	
6	Santee Cooper	Suzanne Ritter	Affirmative	
6	Seminole Electric Cooperative, Inc.	Trudy S. Novak	Affirmative	
6	Xcel Energy, Inc.	David F. Lemmons	Affirmative	
8	JDRJC Associates	Jim D. Cyrulewski	Affirmative	
8	Volkman Consulting, Inc.	Terry Volkman	Affirmative	
9	California Energy Commission	William Mitchell Chamberlain	Affirmative	
9	Commonwealth of Massachusetts Department of Public Utilities	Donald E. Nelson	Affirmative	
10	Electric Reliability Council of Texas, Inc.	Kent Saathoff	Negative	<a href="#">View</a>
10	Northeast Power Coordinating Council, Inc.	Guy Zito	Affirmative	
10	ReliabilityFirst Corporation	Jacque Smith	Affirmative	
10	SERC Reliability Corporation	Carter B. Edge	Affirmative	
10	Southwest Power Pool	Charles H. Yeung		
10	Western Electricity Coordinating Council	Louise McCarren	Affirmative	

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## Standards Announcement

### Ballot Results

Now available at: <https://standards.nerc.net/Ballots.aspx>

#### **Revised Interpretation of EOP-001-0 Requirement R1 for Regional Entity Compliance Managers (Project 2008-09)**

Since at least one negative ballot was submitted with a comment, a recirculation ballot will be held. The recirculation ballot will be held after the drafting team responds to voter comments submitted during this ballot.

The initial ballot for the revised interpretation of EOP-001-0 — Emergency Operations Planning Requirement R1 for the Regional Entity Compliance Managers ended March 9, 2009. The ballot results are shown below. The [Ballot Results](#) Web page provides a link to the detailed results.

Quorum:	89.67%
Approval:	89.03%

Project page: <http://www.nerc.com/filez/standards/EOP-001-0 Interpretation RECM.html>

#### **Ballot Criteria**

Approval requires both:

- A quorum, which is established by at least 75% of the members of the ballot pool for submitting either an affirmative vote, a negative vote, or an abstention; and
- A two-thirds majority of the weighted segment votes cast must be affirmative. The number of votes cast is the sum of affirmative and negative votes, excluding abstentions and nonresponses.

#### **Standards Development Process**

The [Reliability Standards Development Procedure](#) contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate.

*For more information or assistance,  
please contact Shaun Streeter at [shaun.streeter@nerc.net](mailto:shaun.streeter@nerc.net) or at 609.452.8060.*

## Consideration of Comments on Initial Ballot for the Revised Interpretation of EOP-001-0 Requirement R1 for the Regional Entity Compliance Managers (Project 2008-09)

Ballot conducted from February 27 to March 9, 2009

### Summary Consideration:

There were three primary areas of concern expressed by balloters who submitted a negative vote:

1. EOP-001-0 should be applied on an Interconnection basis. Therefore, balloters recommended modifying paragraph 2 of the interpretation by inserting the phrase “interconnected by AC ties or DC (asynchronous) ties within the same Interconnection.” The Operating Reliability Subcommittee Executive Committee (ORS EC), which is serving as the drafting team for the interpretation, agrees with these balloters and proposes to modify paragraph 2 accordingly.
2. Several balloters questioned the use of the word “all” in the second sentence paragraph 3 of the interpretation. Use of the word all in this context implied to balloters that “at least one” was required. The ORS EC agrees with balloters and proposes to modify the interpretation by changing the word “all” to “any” in the second sentence of paragraph 3.
3. Several balloters questioned whether a Reserve Sharing Group agreement could substitute for an emergency assistance agreement with adjacent Balancing Authorities. Without an emergency assistance agreement, the conditions under which emergency energy assistance could be provided will remain undefined. The ORS EC agrees with balloters and proposes to modify paragraph 4 of the interpretation to read, “A Reserve Sharing Group agreement that contains provisions for emergency assistance may be used to meet Requirement R1 of EOP-001-0.”

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, Gerry Adamski, at 609-452-8060 or at [gerry.adamski@nerc.net](mailto:gerry.adamski@nerc.net). In addition, there is a NERC Reliability Standards Appeals Process.<sup>1</sup>

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<sup>1</sup> The appeals process is in the Reliability Standards Development Procedure: [http://www.nerc.com/files/RSDP\\_V6\\_1\\_12Mar07.pdf](http://www.nerc.com/files/RSDP_V6_1_12Mar07.pdf).

Voter	Entity	Segment	Vote	Comment
Stanley M Jaskot	Entergy Corporation	5	Negative	<p>1. We believe this standard should be applied on an Interconnection basis. Therefore, we recommend Item #2 be revised to "The intent is that all Balancing Authorities, interconnected by AC ties or DC (asynchronous) ties within the same Interconnection, have emergency ..." 2. We also recommend the "responsible Balancing Authority" be revised to "deficient Balancing Authority" in Item #3. Item # 3. A remote Balancing Authority is a Balancing Authority other than an Adjacent Balancing Authority. The responsible DEFICIENT Balancing Authority is not required to have arrangements in place to obtain emergency energy assistance with all remote Balancing Authorities. The responsible DEFICIENT Balancing Authority's agreement(s) with the Adjacent Balancing Authorities does (do) not preclude the Adjacent Balancing Authority from purchasing emergency energy from remote Balancing Authorities on behalf of the responsible DEFICIENT Balancing Authority. 3. We agree with the clarification that BAs are not required to have agreements with ALL Adjacent BAs.</p>
<p><b>Response:</b> Comment 1 – The Operating Reliability Subcommittee Executive Committee (ORS EC) agrees with the balloter and will insert the phrase “interconnected by AC ties or DC (asynchronous) ties within the same Interconnection” in the first sentence of paragraph 2. Comment 2 – The ORS EC agrees to eliminate the term “responsible” from the second, third, and forth sentences of paragraph 3. The ORS EC does not agree to insertion of the term “deficient.” EOP-001-0 is applicable to all Balancing Authorities. In addition, the ORS EC proposes to reword the last sentence of paragraph 3 to eliminate “on behalf of the responsible BA.” Comment 3 - The ORS EC agrees with the balloter; however, in response to other balloters, the ORS EC proposes to modify the interpretation by changing the word “all” to “any” in paragraph 3.</p>				
Paul Rocha	CenterPoint Energy	1	Negative	<p>CenterPoint Energy recommends further clarification of the terms "adjacent" and "neighboring" to address that such terms are not applicable to interconnection-wide regions, such as WECC and ERCOT. The proposed definition failed to explain the term "adjacent" as requested.</p>
<p><b>Response:</b> The ORS EC agrees with the balloter and will insert the phrase “interconnected by AC ties or DC (asynchronous) ties within the same Interconnection” in the first sentence of paragraph 2 of the interpretation.</p>				



Voter	Entity	Segment	Vote	Comment
Robert Martinko	FirstEnergy Energy Delivery	1	Affirmative	FirstEnergy supports the interpretation provided for EOP-001 Requirement R1 and believes it further clarifies Balancing Authority expectations related to emergency assistance agreements with other Balancing Authorities. It is expected that the standards drafting team that will work on Project 2009-03 will incorporate this interpretation when completing revisions to the EOP-001 standard to achieve greater clarity within the standard's requirements and measures.
Joanne Kathleen Borrell	FirstEnergy Solutions	3	Affirmative	FirstEnergy supports the interpretation provided for EOP-001 Requirement R1 and believes it further clarifies Balancing Authority expectations related to emergency assistance agreements with other Balancing Authorities. It is expected that the standards drafting team that will work on Project 2009-03 will incorporate this interpretation when completing revisions to the EOP-001 standard to achieve greater clarity within the standard's requirements and measures.
Douglas Hohlbaugh	Ohio Edison Company	4	Affirmative	FirstEnergy supports the interpretation provided for EOP-001 Requirement R1 and believes it further clarifies Balancing Authority expectations related to emergency assistance agreements with other Balancing Authorities. It is expected that the standards drafting team that will work on Project 2009-03 will incorporate this interpretation when completing revisions to the EOP-001 standard to achieve greater clarity within the standard's requirements and measures.
Kenneth Dresner	FirstEnergy Solutions	5	Affirmative	FirstEnergy supports the interpretation provided for EOP-001 Requirement R1 and believes it further clarifies Balancing Authority expectations related to emergency assistance agreements with other Balancing Authorities. It is expected that the standards drafting team that will work on Project 2009-03 will incorporate this interpretation when completing revisions to the EOP-001 standard to achieve greater clarity within the standard's requirements and measures.
Mark S Travaglianti	FirstEnergy Solutions	6	Affirmative	FirstEnergy supports the interpretation provided for EOP-001 Requirement R1 and believes it further clarifies Balancing Authority expectations related to emergency assistance agreements with other Balancing Authorities. It is expected that the standards drafting team that will work on Project 2009-03 will incorporate this interpretation when completing revisions to the EOP-001 standard to achieve greater clarity within the standard's requirements and measures.
<b>Response:</b> The ORS EC agrees with the balloters.				

Voter	Entity	Segment	Vote	Comment
Roy D. McCoy	Electric Reliability Council of Texas, Inc.	2	Negative	Interpretation should clarify what "adjacent" and "neighboring" means. Does it mean that EOP-001 applies to registered functional entities with AC ties or DC ties "within" an Interconnection and does not apply to DC ties "between" Interconnections?
<p><b>Response:</b> The ORS EC agrees with the balloter and will insert the phrase "interconnected by AC ties or DC (asynchronous) ties within the same Interconnection" in the first sentence of paragraph 2 of the interpretation.</p>				
Alden Briggs	New Brunswick System Operator	2	Negative	NBSO disagrees with this interpretation for two reasons: Firstly, 4. A Balancing Authority that is compliant with Reliability Standard BAL-002-0, Requirement R2 through participation in a Reserve Sharing Group Agreement is not required to establish additional operating agreements as described in Requirement R1 of EOP-001-0. Reserve Sharing agreements may not include emergency energy agreements. Secondly, From the 3rd paragraph on the interpretation: The responsible Balancing Authority is not required to have arrangements in place to obtain emergency energy assistance with all remote Balancing Authorities. This statement appears to state that an agreement is required with a remote BA. Though it is believed that this was not the intent of the interpretation it can cause confusion.
<p><b>Response:</b> Comment 1 – The ORS EC agrees with balloter and proposes to modify paragraph 4 of the interpretation to read, "A Reserve Sharing Group agreement that contains provisions for emergency assistance may be used to meet Requirement R1 of EOP-001-0." Comment 2 - The ORS EC agrees with balloter and proposes to modify paragraph 3 of the interpretation by changing the word "all" to "any" in the second sentence.</p>				
Richard Kinas	Orlando Utilities Commission	5	Affirmative	Since you decided to place Adjacent into the NERC glossary, I'm suprised that you did not decide to do the same with "remote" i.e. Remote - any entity that is not Adjacent
<p><b>Response:</b> The term Adjacent Balancing Authority is in the <i>Glossary of Terms Used in Reliability Standards</i>. The <i>Glossary of Terms Used in Reliability Standards</i> may not be modified via an interpretation.</p>				

Voter	Entity	Segment	Vote	Comment
Kim Warren	Independent Electricity System Operator	2	Negative	The IESO views the Reserve Sharing Group (RSG) and emergency assistance agreements as distinct and serving two separate and necessary functions. Under this interpretation we envisage situations where, despite the existence of the RSG agreement, emergency assistance (that may be needed for a lengthy period) may not be provided because its scope and conditions of supply are not defined. We believe this therefore leaves room for non-compliance and would expose the system to unreliable operation when emergency assistance is needed but cannot be arranged or delivered absent an operating agreement. We agree that a RSG agreement may be adequate to meet EOP-001-0, R1 but only if it explicitly includes provisions for emergency energy assistance.
<b>Response:</b> The ORS EC agrees with balloter and proposes to modify paragraph 4 of the interpretation to read, "A Reserve Sharing Group agreement that contains provisions for emergency assistance may be used to meet Requirement R1 of EOP-001-0."				
James Armke	Austin Energy	1	Negative	The Interpretation should clarify that the adjective "adjacent" is intended for neighboring Balancing Authorities interconnected by AC ties. For ERCOT, the requirement would be unnecessary and burdensom with no impact to reliability because flows across the DC ties remain at their scheduled values and do not impact neighboring Balancing Authorities.
<b>Response:</b> The ORS EC agrees with the balloter and will insert the phrase "interconnected by AC ties or DC (asynchronous) ties within the same Interconnection" in the first sentence of paragraph 2 of the interpretation.				
Gregory Campoli	New York Independent System Operator	2	Negative	The NYISO is concerned with the second sentence in Paragraph 3 that says, 'The responsible Balancing Authority is not required to have arrangements in place to obtain emergency energy assistance with all remote Balancing Authorities.' We are concerned that this means that a BA is required to have an agreement in place for purchasing emergency energy with at least one remote BA. We do not support this interpretation and believe that existing standard only obligates a BA to have agreements in place with adjacent BA's. The NYISO is also concerned that a Reserve Sharing Group (RSG) can be a substitute for emergency assistance agreement with adjacent BA's. Without an emergency assistance agreement, the scope of and conditions under which emergency energy assistance could be provided, will remain undefined.
<b>Response:</b> Comment 1 – The ORS EC agrees with balloter and proposes to modify paragraph 3 of the interpretation by changing the word "all" to "any" in the				

Voter	Entity	Segment	Vote	Comment
second sentence. Comment 2 – The ORS EC agrees with balloter and proposes to modify paragraph 4 of the interpretation to read, “A Reserve Sharing Group agreement that contains provisions for emergency assistance may be used to meet Requirement R1 of EOP-001-0.”				
Kent Saathoff	Electric Reliability Council of Texas, Inc.	10	Negative	The original interpretation was correct. This revised interpretation would apply requirements appropriate for adjacent entities connected synchronously by AC lines to entities connected only by asynchronous DC lines. Such requirements would serve no reliability purpose and be a waste of resources for entities connected solely by DC ties which have no uncontrolled flows.
<b>Response:</b> The ORS EC agrees with the balloter and will insert the phrase “interconnected by AC ties or DC (asynchronous) ties within the same Interconnection” in the first sentence of paragraph 2 of the interpretation.				
James R. Keller	Wisconsin Electric Power Marketing	3	Negative	The sentence within #3 of the EOP-001-1 R1 interpretation “The responsible Balancing Authority is not required to have arrangements in place to obtain emergency energy assistance with all remote Balancing Authorities.” is stating that the Responsible BA must have arrangements with some remote BAs. The “all” needs to be replaced with “any” in this sentence.
Linda Horn	Wisconsin Electric Power Co.	5	Negative	The sentence within #3 of the EOP-001-1 R1 interpretation “The responsible Balancing Authority is not required to have arrangements in place to obtain emergency energy assistance with all remote Balancing Authorities.” is stating that the Responsible BA must have arrangements with some remote BAs. The “all” needs to be replaced with “any” in this sentence.
<b>Response:</b> The ORS EC agrees with balloter and proposes to modify paragraph 3 of the interpretation by changing the word “all” to “any” in the second sentence.				
Anthony Jankowski	Wisconsin Energy Corp.	4	Negative	The wording related to Remote Balancing Authorities should read “with any” instead of “with all” in paragraph #3.
<b>Response:</b> The ORS EC agrees with balloter and proposes to modify paragraph 3 of the interpretation by changing the word “all” to “any” in the second sentence.				



NORTH AMERICAN ELECTRIC  
RELIABILITY CORPORATION

April 2, 2008

Maureen Long  
Standards Process Manager  
North American Electric Reliability Corporation  
116-390 Village Blvd.  
Princeton, NJ 08540

**Re: Formal Interpretation Request for Reliability Standard EOP-001-0, Requirement 1**

Dear Maureen,

The Regional Entity Compliance Managers (RECM) request a formal interpretation of Reliability Standard EOP-001-0 — Emergency Operations Planning Requirement R1 in accordance with the Reliability Standards Development Procedure.

Material Impact: A formal interpretation is required for Regional Entities to consistently assess compliance with this standard and to ensure Registered Entities are meeting their obligation and responsibility as intended by the standard.

Clarification is needed for Reliability Standard EOP-001-0 Requirement R1 which states:

- R1.** Balancing Authorities shall have operating agreements with adjacent Balancing Authorities that shall, at a minimum, contain provisions for emergency assistance, including provisions to obtain emergency assistance from remote Balancing Authorities.

Specifically, the RECM requests an interpretation and clarity for the following language listed in EOP-001-0, Requirement 1:

1. What is the definition of emergency assistance in the context of this standard? What scope and time horizons, if any, are considered necessary in this definition?
2. What was intended by using the adjective “adjacent” in Requirement 1? Does “adjacent” Balancing Authorities mean “All” or something else? Is there qualifying criteria to determine if a very small adjacent Balancing Authority area has enough capacity to offer emergency assistance?
3. What is the definition of the word “remote” as stated in the last phrase of Requirement 1? Does remote mean every Balancing Authority who’s area does not physically touch the Balancing Authority attempting to comply with this Requirement?

4. Would a Balancing Authority that participates in a Reserve Sharing Group Agreement, which meets the requirements of Reliability Standard BAL-002-0, Requirement 2, be required to establish additional operating agreements to achieve compliance with Reliability Standard EOP-001-0, Requirement 1?

If you have any questions concerning this request please contact Susan Morris, Manager of Regional Compliance Program Oversight at [susan.morris@nerc.net](mailto:susan.morris@nerc.net) or (609) 240-6784.

Sincerely,

Regional Entity Compliance Managers:

Barry Pagel, Florida Reliability Coordinating Council  
Stanley Kopman, Northeast Power Coordinating Council  
Wayne VanOsdol, Midwest Reliability Organization  
Ray Palmieri, Reliability *First* Corporation  
Tom Galloway, SERC Reliability Corporation  
Ron Ciesiel, Southwest Power Pool Regional Entity  
Mark Henry, Texas Regional Entity  
Steve McCoy, Western Electricity Coordinating Council

CC: David Taylor  
Gerry Adamski  
Regional Entity Compliance Monitoring Group  
Compliance Department

## Revised Interpretation of EOP-001-0 — Emergency Operations Planning Requirement R1 for the Regional Entity Compliance Managers (Project 2008-09)

Request for Interpretation Received from Regional Entity Compliance Managers on March 20, 2008:

### Request:

*The Regional Entity Compliance Managers (RECM) request a formal interpretation of Reliability Standard EOP-001-0 — Emergency Operations Planning Requirement R1 in accordance with the Reliability Standards Development Procedure.*

- 1. What is the definition of emergency assistance in the context of this standard? What scope and time horizons, if any, are considered necessary in this definition?*
- 2. What was intended by using the adjective “adjacent” in Requirement 1? Does “adjacent Balancing Authorities” mean “All” or something else? Is there qualifying criteria to determine if a very small adjacent Balancing Authority area has enough capacity to offer emergency assistance?*
- 3. What is the definition of the word “remote” as stated in the last phrase of Requirement 1? Does remote mean every Balancing Authority who’s area does not physically touch the Balancing Authority attempting to comply with this Requirement?*
- 4. Would a Balancing Authority that participates in a Reserve Sharing Group Agreement, which meets the requirements of Reliability Standard BAL-002-0, Requirement 2, have to establish additional operating agreements to achieve compliance with Reliability Standard EOP-001-0, Requirement 1?*

### **EOP-001-0**

**R1. Balancing Authorities shall have operating agreements with adjacent Balancing Authorities that shall, at a minimum, contain provisions for emergency assistance, including provisions to obtain emergency assistance from remote Balancing Authorities.**

The following revised (October 2009) interpretation of EOP-001-0 — Emergency Operations Planning Requirement R1 was developed by the Executive Committee of the NERC Operating Reliability Subcommittee:

### Interpretation of EOP-001-0 Requirement R1:

1. In the context of this standard, emergency assistance is emergency energy. Emergency energy would normally be arranged for during the current operating day. The agreement should describe the conditions under which the emergency energy will be delivered to the responsible Balancing Authority.
2. The intent is that all Balancing Authorities, interconnected by AC ties or DC (asynchronous) ties within the same Interconnection, have emergency energy assistance agreements with at least one Adjacent Balancing Authority and have sufficient emergency energy assistance

agreements to mitigate reasonably anticipated energy emergencies. However, the standard does not require emergency energy assistance agreements with all Adjacent Balancing Authorities.

3. A remote Balancing Authority is a Balancing Authority other than an Adjacent Balancing Authority. A Balancing Authority is not required to have arrangements in place to obtain emergency energy assistance with any remote Balancing Authorities. A Balancing Authority's agreement(s) with Adjacent Balancing Authorities does (do) not preclude the Adjacent Balancing Authority from purchasing emergency energy from remote Balancing Authorities.
4. A Reserve Sharing Group agreement that contains provisions for emergency assistance may be used to meet Requirement R1 of EOP-001-0.



**Revised Interpretation of EOP-001-0 — Emergency Operations Planning Requirement R1 for the Regional Entity Compliance Managers ([Project 2008-09](#))**

**Request for Interpretation Received from Regional Entity Compliance Managers on March 20, 2008:**

**Request:**

*The Regional Entity Compliance Managers (RECM) request a formal interpretation of Reliability Standard EOP-001-0 — Emergency Operations Planning Requirement R1 in accordance with the Reliability Standards Development Procedure.*

- 1. What is the definition of emergency assistance in the context of this standard? What scope and time horizons, if any, are considered necessary in this definition?*
- 2. What was intended by using the adjective “adjacent” in Requirement 1? Does “adjacent Balancing Authorities” mean “All” or something else? Is there qualifying criteria to determine if a very small adjacent Balancing Authority area has enough capacity to offer emergency assistance?*
- 3. What is the definition of the word “remote” as stated in the last phrase of Requirement 1? Does remote mean every Balancing Authority who’s area does not physically touch the Balancing Authority attempting to comply with this Requirement?*
- 4. Would a Balancing Authority that participates in a Reserve Sharing Group Agreement, which meets the requirements of Reliability Standard BAL-002-0, Requirement 2, have to establish additional operating agreements to achieve compliance with Reliability Standard EOP-001-0, Requirement 1?*

**EOP-001-0**

**R1. Balancing Authorities shall have operating agreements with adjacent Balancing Authorities that shall, at a minimum, contain provisions for emergency assistance, including provisions to obtain emergency assistance from remote Balancing Authorities.**

The following revised ([October 2009](#)) interpretation of EOP-001-0 — Emergency Operations Planning Requirement R1 was developed by the Executive Committee of the NERC Operating Reliability Subcommittee:

**Interpretation of EOP-001-0 Requirement R1:**

1. In the context of this standard, emergency assistance is emergency energy. Emergency energy would normally be arranged for during the current operating day. The agreement should describe the conditions under which the emergency energy will be delivered to the responsible Balancing Authority.
2. The intent is that all Balancing Authorities, [interconnected by AC ties or DC \(asynchronous\) ties within the same Interconnection](#), have emergency energy assistance agreements with at least one Adjacent Balancing Authority and have sufficient emergency energy assistance

agreements to mitigate reasonably anticipated energy emergencies. However, the standard does not require emergency energy assistance agreements with all Adjacent Balancing Authorities.

3. A remote Balancing Authority is a Balancing Authority other than an Adjacent Balancing Authority. ~~The~~<sup>A</sup> ~~responsible~~-Balancing Authority is not required to have arrangements in place to obtain emergency energy assistance with ~~all~~<sup>any</sup> remote Balancing Authorities. ~~The~~<sup>A</sup> ~~responsible~~-Balancing Authority's agreement(s) with ~~the~~-Adjacent Balancing Authorities does (do) not preclude the Adjacent Balancing Authority from purchasing emergency energy from remote Balancing Authorities ~~on behalf of the responsible Balancing Authority~~.
4. A ~~Balancing Authority that is compliant with Reliability Standard BAL-002-0, Requirement R2 through participation in a~~ Reserve Sharing Group ~~A~~<sup>an</sup> agreement that contains provisions for emergency assistance may be used to meet ~~is not required to establish additional operating agreements as described in~~ Requirement R1 of EOP-001-0.

## Standards Announcement

### Ballot Pool and Pre-ballot Window

October 6–November 5, 2009

Now available at: <https://standards.nerc.net/BallotPool.aspx>

#### **Project 2008-09: Interpretation of EOP-001-0 for Regional Entity Compliance Managers (Revision 2)**

A revised interpretation of EOP-001-0 — Emergency Operations Planning Requirement R1 for the Regional Entity Compliance Managers is posted for a 30-day pre-ballot review. Registered Ballot Body members may join the ballot pool to be eligible to vote on this interpretation **until 8 a.m. EST on November 5, 2009**.

During the pre-ballot window, members of the ballot pool may communicate with one another by using their “ballot pool list server.” (Once the balloting begins, ballot pool members are prohibited from using the ballot pool list servers.) The list server for this ballot pool is: [bp-2008-09 RFI RECM-Rv2 in](#).

#### **Next Steps**

Voting will begin shortly after the pre-ballot review closes.

#### **Project Background**

The Regional Entity Compliance Managers group submitted a request for interpretation for EOP-001-0 Requirement R1. Under Requirement R1, the Balancing Authority must have operating agreements with adjacent Balancing Authorities that contain provisions for emergency assistance, including emergency assistance from remote Balancing Authorities. The request asked for clarification on specific terminology and the applicability of Reserve Sharing Group Agreements.

This is the second revision of the interpretation. The drafting team revised the interpretation to address balloter concerns regarding 1) application on an Interconnection basis, 2) whether an agreement was required with a remote Balancing Authority, and 3) whether a Reserve Sharing Group agreement could substitute for an emergency assistance agreement with adjacent Balancing Authorities. The changes to the interpretation are shown in a redline version posted for review. The team has also posted a response to comments received during the initial ballot (February 2009) of the first revision. Project page: <http://www.nerc.com/filez/standards/EOP-001-0 Interpretation RECM.html>

#### **Standards Development Process**

The [Reliability Standards Development Procedure](#) contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate.

*For more information or assistance,  
please contact Shaun Streater at [shaun.streater@nerc.net](mailto:shaun.streater@nerc.net) or at 609.452.8060.*



NORTH AMERICAN ELECTRIC  
RELIABILITY CORPORATION

## Standards Announcement

### Initial Ballot Window Open

November 5–16, 2009

Now available at: <https://standards.nerc.net/CurrentBallots.aspx>

#### **Project 2008-09: Interpretation of EOP-001-0 for Regional Entity Compliance Managers (Revision 2)**

An initial ballot window for a revised interpretation of standard EOP-001-0 — Emergency Operations Planning, Requirement R1, for the Regional Entity Compliance Managers is now open **until 8 p.m. EST on November 16, 2009**.

#### **Instructions**

Members of the ballot pool associated with this project may log in and submit their votes from the following page: <https://standards.nerc.net/CurrentBallots.aspx>

#### **Next Steps**

Voting results will be posted and announced after the ballot window closes.

#### **Project Background**

The Regional Entity Compliance Managers group submitted a request for an interpretation of EOP-001-0 Requirement R1. Under Requirement R1, the Balancing Authority must have operating agreements with adjacent Balancing Authorities that contain provisions for emergency assistance, including emergency assistance from remote Balancing Authorities. The request asked for clarification on specific terminology and the applicability of Reserve Sharing Group Agreements.

This is the second revision of the interpretation. The drafting team revised the interpretation to address balloter concerns regarding 1) application on an Interconnection basis, 2) whether an agreement was required with a remote Balancing Authority, and 3) whether a Reserve Sharing Group agreement could substitute for an emergency assistance agreement with adjacent Balancing Authorities. The changes to the interpretation are shown in a redline version posted for on the project page. The team has also posted a response to comments received during the initial ballot (conducted in February 2009) of the first revision.

Project page: <http://www.nerc.com/filez/standards/EOP-001-0 Interpretation RECM.html>

#### **Standards Development Process**

The [Reliability Standards Development Procedure](#) contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate.

*For more information or assistance,  
please contact Shaun Streater at [shaun.streater@nerc.net](mailto:shaun.streater@nerc.net) or at 609.452.8060.*

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- Ballot Pools
- Current Ballots
- Ballot Results
- Registered Ballot Body
- Proxy Voters

[Home Page](#)

Ballot Results	
<b>Ballot Name:</b>	Project 2008-09 - Interpretation - RECM - Revision 2_in
<b>Ballot Period:</b>	11/5/2009 - 11/16/2009
<b>Ballot Type:</b>	Initial
<b>Total # Votes:</b>	190
<b>Total Ballot Pool:</b>	221
<b>Quorum:</b>	<b>85.97 % The Quorum has been reached</b>
<b>Weighted Segment Vote:</b>	98.07 %
<b>Ballot Results:</b>	<b>The standard will proceed to recirculation ballot.</b>

Summary of Ballot Results									
Segment	Ballot Pool	Segment Weight	Affirmative		Negative		Abstain # Votes	No Vote	
			# Votes	Fraction	# Votes	Fraction			
1 - Segment 1.		58	1	47	0.959	2	0.041	1	8
2 - Segment 2.		11	1	10	1	0	0	0	1
3 - Segment 3.		52	1	40	0.976	1	0.024	5	6
4 - Segment 4.		11	0.9	9	0.9	0	0	0	2
5 - Segment 5.		42	1	30	0.968	1	0.032	3	8
6 - Segment 6.		26	1	19	0.95	1	0.05	3	3
7 - Segment 7.		0	0	0	0	0	0	0	0
8 - Segment 8.		6	0.5	5	0.5	0	0	0	1
9 - Segment 9.		7	0.4	4	0.4	0	0	1	2
10 - Segment 10.		8	0.8	8	0.8	0	0	0	0
<b>Totals</b>		<b>221</b>	<b>7.6</b>	<b>172</b>	<b>7.453</b>	<b>5</b>	<b>0.147</b>	<b>13</b>	<b>31</b>

Individual Ballot Pool Results				
Segment	Organization	Member	Ballot	Comments
1	Allegheny Power	Rodney Phillips		
1	Ameren Services	Kirit S. Shah	Affirmative	<a href="#">View</a>
1	American Electric Power	Paul B. Johnson	Negative	<a href="#">View</a>
1	American Transmission Company, LLC	Jason Shaver	Affirmative	
1	Associated Electric Cooperative, Inc.	John Bussman		
1	Avista Corp.	Scott Kinney	Negative	
1	BC Transmission Corporation	Gordon Rawlings	Affirmative	
1	Black Hills Corp	Eric Egge	Affirmative	

1	Bonneville Power Administration	Donald S. Watkins	Affirmative	
1	Brazos Electric Power Cooperative, Inc.	Tony Kroskey		
1	CenterPoint Energy	Paul Rocha	Affirmative	
1	Central Maine Power Company	Brian Conroy	Affirmative	
1	Consolidated Edison Co. of New York	Christopher L de Graffenried	Affirmative	
1	Dominion Virginia Power	William L. Thompson	Affirmative	
1	Duke Energy Carolina	Douglas E. Hils	Affirmative	
1	Energy Corporation	George R. Bartlett	Affirmative	
1	FirstEnergy Energy Delivery	Robert Martinko	Affirmative	<a href="#">View</a>
1	Florida Keys Electric Cooperative Assoc.	Dennis Minton	Affirmative	
1	Georgia Transmission Corporation	Harold Taylor, II	Affirmative	
1	Great River Energy	Gordon Pietsch	Affirmative	
1	Hoosier Energy Rural Electric Cooperative, Inc.	Damon Holladay	Affirmative	
1	Hydro One Networks, Inc.	Ajay Garg	Affirmative	
1	Hydro-Quebec TransEnergie	Albert Poire	Affirmative	
1	Idaho Power Company	Ronald D. Schellberg	Affirmative	
1	ITC Transmission	Elizabeth Howell	Affirmative	
1	Lakeland Electric	Larry E Watt	Affirmative	
1	Lee County Electric Cooperative	John W Delucca	Abstain	
1	Long Island Power Authority	Jonathan Appelbaum	Affirmative	
1	Manitoba Hydro	Michelle Rheault		
1	MEAG Power	Danny Dees	Affirmative	
1	MidAmerican Energy Co.	Terry Harbour	Affirmative	
1	Nebraska Public Power District	Richard L. Koch	Affirmative	
1	New York State Electric & Gas Corp.	Henry G. Masti	Affirmative	
1	Northeast Utilities	David H. Boguslawski	Affirmative	
1	NorthWestern Energy	John Canavan	Affirmative	
1	Ohio Valley Electric Corp.	Robert Matthey		
1	Otter Tail Power Company	Lawrence R. Larson	Affirmative	
1	PacifiCorp	Mark Sampson	Affirmative	
1	Potomac Electric Power Co.	Richard J. Kafka	Affirmative	
1	PowerSouth Energy Cooperative	Larry D. Avery	Affirmative	
1	PP&L, Inc.	Ray Mammarella	Affirmative	
1	Public Service Electric and Gas Co.	Kenneth D. Brown	Affirmative	
1	Puget Sound Energy, Inc.	Catherine Koch	Affirmative	
1	Sacramento Municipal Utility District	Tim Kelley	Affirmative	
1	Salt River Project	Robert Kondziolka	Affirmative	
1	Santee Cooper	Terry L. Blackwell	Affirmative	
1	SCE&G	Henry Delk, Jr.		
1	Seattle City Light	Pawel Krupa		
1	Sierra Pacific Power Co.	Richard Salgo	Affirmative	
1	Southern California Edison Co.	Dana Cabbell		
1	Southern Company Services, Inc.	Horace Stephen Williamson	Affirmative	
1	Southwest Transmission Cooperative, Inc.	James L. Jones	Affirmative	
1	Southwestern Power Administration	Gary W Cox	Affirmative	
1	Tri-State G & T Association Inc.	Keith V. Carman	Affirmative	
1	Tucson Electric Power Co.	John Tolo	Affirmative	
1	Westar Energy	Allen Klassen	Affirmative	
1	Western Area Power Administration	Brandy A Dunn	Affirmative	
1	Xcel Energy, Inc.	Gregory L Pieper	Affirmative	
2	Alberta Electric System Operator	Jason L. Murray	Affirmative	
2	BC Transmission Corporation	Faramarz Amjadi	Affirmative	
2	California ISO	Greg Tillitson	Affirmative	
2	Electric Reliability Council of Texas, Inc.	Chuck B Manning	Affirmative	
2	Independent Electricity System Operator	Kim Warren	Affirmative	<a href="#">View</a>
2	ISO New England, Inc.	Kathleen Goodman	Affirmative	
2	Midwest ISO, Inc.	Jason L Marshall	Affirmative	
2	New Brunswick System Operator	Alden Briggs	Affirmative	
2	New York Independent System Operator	Gregory Campoli		
2	PJM Interconnection, L.L.C.	Tom Bowe	Affirmative	
2	Southwest Power Pool	Charles H Yeung	Affirmative	
3	Alabama Power Company	Bobby Kerley	Affirmative	
3	Allegheny Power	Bob Reeping		
3	Ameren Services	Mark Peters	Affirmative	<a href="#">View</a>
3	American Electric Power	Raj Rana	Negative	<a href="#">View</a>
3	Anaheim Public Utilities Dept.	Kelly Nguyen	Abstain	

3	Atlantic City Electric Company	James V. Petrella	Affirmative	
3	BC Hydro and Power Authority	Pat G. Harrington	Abstain	
3	Bonneville Power Administration	Rebecca Berdahl	Affirmative	
3	City of Farmington	Linda R. Jacobson	Affirmative	
3	Consolidated Edison Co. of New York	Peter T Yost	Affirmative	
3	Constellation Energy	Carolyn Ingersoll	Affirmative	
3	Consumers Energy	David A. Lapinski	Affirmative	
3	Delmarva Power & Light Co.	Michael R. Mayer	Affirmative	
3	Detroit Edison Company	Kent Kujala	Affirmative	
3	Dominion Resources, Inc.	Jalal (John) Babik	Affirmative	
3	Duke Energy Carolina	Henry Ernst-Jr	Affirmative	
3	Entergy Services, Inc.	Matt Wolf	Affirmative	
3	FirstEnergy Solutions	Joanne Kathleen Borrell	Affirmative	<a href="#">View</a>
3	Florida Power Corporation	Lee Schuster	Affirmative	
3	Georgia Power Company	Leslie Sibert	Affirmative	
3	Georgia System Operations Corporation	R Scott S. Barfield-McGinnis	Affirmative	
3	Great River Energy	Sam Kokkinen	Affirmative	
3	Gulf Power Company	Gwen S Frazier	Affirmative	
3	Hydro One Networks, Inc.	Michael D. Penstone	Affirmative	
3	JEA	Garry Baker	Affirmative	
3	Kansas City Power & Light Co.	Charles Locke		
3	Kissimmee Utility Authority	Gregory David Woessner	Affirmative	
3	Lakeland Electric	Mace Hunter	Affirmative	
3	Lincoln Electric System	Bruce Merrill	Affirmative	
3	Louisville Gas and Electric Co.	Charles A. Freibert	Affirmative	
3	Manitoba Hydro	Greg C Parent		
3	MidAmerican Energy Co.	Thomas C. Mielnik	Affirmative	
3	Mississippi Power	Don Horsley	Affirmative	
3	Muscataine Power & Water	John Bos	Affirmative	
3	Niagara Mohawk (National Grid Company)	Michael Schiavone	Affirmative	
3	Northern Indiana Public Service Co.	William SeDoris	Affirmative	
3	Orlando Utilities Commission	Ballard Keith Mutters	Abstain	
3	PacifiCorp	John Apperson	Affirmative	
3	Platte River Power Authority	Terry L Baker	Affirmative	
3	Potomac Electric Power Co.	Robert Reuter	Abstain	
3	Progress Energy Carolinas	Sam Waters	Affirmative	
3	Public Service Electric and Gas Co.	Jeffrey Mueller	Affirmative	
3	Public Utility District No. 2 of Grant County	Greg Lange	Affirmative	
3	Sacramento Municipal Utility District	James Leigh-Kendall	Affirmative	
3	Salt River Project	John T. Underhill	Affirmative	
3	Santee Cooper	Zack Dusenbury	Affirmative	
3	Seattle City Light	Dana Wheelock		
3	South Carolina Electric & Gas Co.	Hubert C. Young	Abstain	
3	Southern California Edison Co.	David Schiada		
3	Tampa Electric Co.	Ronald L. Donahey		
3	Wisconsin Electric Power Marketing	James R. Keller	Affirmative	
3	Xcel Energy, Inc.	Michael Ibold	Affirmative	
4	Alliant Energy Corp. Services, Inc.	Kenneth Goldsmith	Affirmative	
4	Consumers Energy	David Frank Ronk	Affirmative	
4	Detroit Edison Company	Daniel Herring	Affirmative	
4	Georgia System Operations Corporation	Guy Andrews	Affirmative	
4	LaGen	Richard Comeaux		
4	Madison Gas and Electric Co.	Joseph G. DePoorter	Affirmative	
4	Ohio Edison Company	Douglas Hohlbaugh	Affirmative	<a href="#">View</a>
4	Sacramento Municipal Utility District	Mike Ramirez	Affirmative	
4	Seattle City Light	Hao Li		
4	Seminole Electric Cooperative, Inc.	Steven R Wallace	Affirmative	
4	Wisconsin Energy Corp.	Anthony Jankowski	Affirmative	
5	AEP Service Corp.	Brock Ondayko		
5	Amerenue	Sam Dwyer	Affirmative	
5	Avista Corp.	Edward F. Groce	Negative	
5	Bonneville Power Administration	Francis J. Halpin	Affirmative	
5	Calpine Corporation	Duncan Brown	Affirmative	
5	City of Tallahassee	Alan Gale	Affirmative	
5	City Water, Light & Power of Springfield	Karl E. Kohlrus	Affirmative	
5	Colmac Clarion/Piney Creek LP	Harvie D. Beavers	Affirmative	
5	Consolidated Edison Co. of New York	Edwin E Thompson	Affirmative	

5	Consumers Energy	James B Lewis	Affirmative	
5	Dairyland Power Coop.	Warren Schaefer	Affirmative	
5	Detroit Edison Company	Ronald W. Bauer	Affirmative	
5	Dominion Resources, Inc.	Mike Garton	Affirmative	
5	Duke Energy	Robert Smith	Affirmative	
5	Entergy Corporation	Stanley M Jaskot	Affirmative	
5	First Wind	Mary J. Cooper		
5	FirstEnergy Solutions	Kenneth Dresner	Affirmative	<a href="#">View</a>
5	Great River Energy	Cynthia E Sulzer		
5	Lakeland Electric	Thomas J Trickey	Affirmative	
5	Lincoln Electric System	Dennis Florom	Affirmative	
5	Manitoba Hydro	Mark Aikens	Abstain	
5	MidAmerican Energy Co.	Christopher Schneider	Abstain	
5	Mint Farm Energy Center	John Walsh		
5	New York Power Authority	Gerald Mannarino	Affirmative	
5	Northern Indiana Public Service Co.	Michael K Wilkerson	Affirmative	
5	Northern States Power Co.	Liam Noailles	Affirmative	
5	Orlando Utilities Commission	Richard Kinas		
5	PacifiCorp Energy	David Godfrey	Affirmative	
5	Portland General Electric Co.	Gary L Tingley	Affirmative	
5	PPL Generation LLC	Mark A. Heimbach	Affirmative	
5	Progress Energy Carolinas	Wayne Lewis	Affirmative	
5	PSEG Power LLC	Thomas Piascik	Affirmative	
5	Sacramento Municipal Utility District	Bethany Wright	Affirmative	
5	Salt River Project	Glen Reeves	Affirmative	
5	Seattle City Light	Michael J. Haynes		
5	Seminole Electric Cooperative, Inc.	Brenda K. Atkins		
5	South California Edison Company	Ahmad Sanati	Abstain	
5	Southeastern Power Administration	Douglas Spencer		
5	Tenaska, Inc.	Scott M. Helyer	Affirmative	
5	U.S. Army Corps of Engineers Northwestern Division	Karl Bryan	Affirmative	
5	U.S. Bureau of Reclamation	Martin Bauer	Affirmative	
5	Wisconsin Electric Power Co.	Linda Horn	Affirmative	
6	AEP Marketing	Edward P. Cox	Negative	<a href="#">View</a>
6	Bonneville Power Administration	Brenda S. Anderson	Affirmative	
6	Consolidated Edison Co. of New York	Nickesha P Carrol		
6	Dominion Resources, Inc.	Louis S Slade	Affirmative	
6	Duke Energy Carolina	Walter Yeager	Affirmative	
6	Entergy Services, Inc.	Terri F Benoit	Affirmative	
6	FirstEnergy Solutions	Mark S Travaglianti	Affirmative	<a href="#">View</a>
6	Great River Energy	Donna Stephenson		
6	Lakeland Electric	Paul Shipps	Affirmative	
6	Lincoln Electric System	Eric Ruskamp	Affirmative	
6	Louisville Gas and Electric Co.	Daryn Barker	Affirmative	
6	Manitoba Hydro	Daniel Prowse	Abstain	
6	New York Power Authority	Thomas Papadopoulos	Affirmative	
6	Northern Indiana Public Service Co.	Joseph O'Brien	Affirmative	
6	PacifiCorp	Gregory D Maxfield	Affirmative	
6	Progress Energy	James Eckelkamp	Affirmative	
6	PSEG Energy Resources & Trade LLC	James D. Hebson	Affirmative	
6	Public Utility District No. 1 of Chelan County	Hugh A. Owen	Abstain	
6	Salt River Project	Mike Hummel		
6	Santee Cooper	Suzanne Ritter	Affirmative	
6	Seattle City Light	Dennis Sismaet	Abstain	
6	Seminole Electric Cooperative, Inc.	Trudy S. Novak	Affirmative	
6	Southern California Edison Co.	Marcus V Lotto	Affirmative	
6	SunGard Data Systems	Christopher K Heisler	Affirmative	
6	Western Area Power Administration - UGP Marketing	John Stonebarger	Affirmative	
6	Xcel Energy, Inc.	David F. Lemmons	Affirmative	
8	Edward C Stein	Edward C Stein	Affirmative	
8	James A Maenner	James A Maenner	Affirmative	
8	JDRJC Associates	Jim D. Cyrulewski	Affirmative	
8	Power Energy Group LLC	Peggy Abbadini		
8	Roger C Zaklukiewicz	Roger C Zaklukiewicz	Affirmative	
8	Volkman Consulting, Inc.	Terry Volkman	Affirmative	





9	California Energy Commission	William Mitchell Chamberlain		
9	Commonwealth of Massachusetts Department of Public Utilities	Donald E. Nelson	Affirmative	
9	Maine Public Utilities Commission	Jacob A McDermott	Abstain	
9	National Association of Regulatory Utility Commissioners	Diane J. Barney	Affirmative	
9	New York State Department of Public Service	Thomas G Dvorsky		
9	Oregon Public Utility Commission	Jerome Murray	Affirmative	
9	Public Utilities Commission of Ohio	Klaus Lambeck	Affirmative	
10	Electric Reliability Council of Texas, Inc.	Kent Saathoff	Affirmative	
10	Florida Reliability Coordinating Council	Linda Campbell	Affirmative	
10	Midwest Reliability Organization	Dan R Schoenecker	Affirmative	
10	New York State Reliability Council	Alan Adamson	Affirmative	
10	Northeast Power Coordinating Council, Inc.	Guy V. Zito	Affirmative	
10	ReliabilityFirst Corporation	Jacque Smith	Affirmative	
10	SERC Reliability Corporation	Carter B Edge	Affirmative	
10	Western Electricity Coordinating Council	Louise McCarren	Affirmative	

Legal and Privacy : 609.452.8060 voice : 609.452.9550 fax : 116-390 Village Boulevard : Princeton, NJ 08540-5721

Washington Office: 1120 G Street, N.W. : Suite 990 : Washington, DC 20005-3801

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NORTH AMERICAN ELECTRIC  
RELIABILITY CORPORATION

## Standards Announcement

### Initial Ballot Results

Now available at: <https://standards.nerc.net/Ballots.aspx>

#### **Project 2008-09: Interpretation of EOP-001-0 for Regional Entity Compliance Managers (Revision 2)**

The initial ballot for a revised interpretation of standard EOP-001-0 — Emergency Operations Planning, Requirement R1, for the Regional Entity Compliance Managers ended on November 16, 2009.

#### **Ballot Results**

Voting statistics are listed below, and the [Ballot Results](#) Web page provides a link to the detailed results:

Quorum: 85.97%  
Approval: 98.07%

Since at least one negative ballot included a comment, these results are not final. A second (or recirculation) ballot must be conducted. Ballot criteria are listed at the end of the announcement.

#### **Next Steps**

As part of the recirculation ballot process, the drafting team must draft and post responses to voter comments. The drafting team will also determine whether or not to make revisions to the balloted item(s). Should the team decide to make revisions, the revised item(s) will return to the initial ballot phase.

#### **Project Background**

The Regional Entity Compliance Managers group submitted a request for an interpretation of EOP-001-0 Requirement R1. Under Requirement R1, the Balancing Authority must have operating agreements with adjacent Balancing Authorities that contain provisions for emergency assistance, including emergency assistance from remote Balancing Authorities. The request asked for clarification on specific terminology and the applicability of Reserve Sharing Group Agreements.

This is the second revision of the interpretation. The drafting team revised the interpretation to address balloter concerns regarding 1) application on an Interconnection basis, 2) whether an agreement was required with a remote Balancing Authority, and 3) whether a Reserve Sharing Group agreement could substitute for an emergency assistance agreement with adjacent Balancing Authorities. The changes to the interpretation are shown in a redline version posted for on the project page. The team has also posted a response to comments received during the initial ballot (conducted in February 2009) of the first revision.

Project page: <http://www.nerc.com/filez/standards/EOP-001-0 Interpretation RECM.html>

#### **Standards Development Process**

The [Reliability Standards Development Procedure](#) contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate.

## **Ballot Criteria**

Approval requires both a (1) quorum, which is established by at least 75% of the members of the ballot pool for submitting either an affirmative vote, a negative vote, or an abstention, and (2) A two-thirds majority of the weighted segment votes cast must be affirmative; the number of votes cast is the sum of affirmative and negative votes, excluding abstentions and nonresponses. If there are no negative votes with reasons from the first ballot, the results of the first ballot shall stand. If, however, one or more members submit negative votes with reasons, a second ballot shall be conducted.

*For more information or assistance,  
please contact Shaun Streeter at [shaun.streeter@nerc.net](mailto:shaun.streeter@nerc.net) or at 609.452.8060.*

**Project 2009-23: Interpretation of EOP-001-0 for the Regional Entity Compliance Managers  
 Consideration of Comments for Initial Ballot of Revision 2 (November 5–16, 2009)**

Summary Consideration: A few balloters explained that the wording in the response to question 2 appeared to limit the Balancing Authority to agreements with Balancing Authorities within the same interconnection, which may be interpreted to nullify the use of existing agreements that cross interconnections as sufficient to meet this requirement. In response to those comments, the Executive Committee of the Operating Reliability Subcommittee, which is serving as the drafting team for this interpretation, revised paragraph 2 to read, “The intent is that all Balancing Authorities, interconnected by AC ties or DC (asynchronous) ties within the same Interconnection, have emergency energy assistance agreements with at least one Adjacent Balancing Authority and have sufficient emergency energy assistance agreements to mitigate reasonably anticipated energy emergencies. However, the standard does not require emergency energy assistance agreements with all Adjacent Balancing Authorities, nor does it preclude having an emergency assistance agreement across Interconnections.”

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, Gerry Adamski, at 609-452-8060 or at gerry.adamski@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.<sup>1</sup>

Voter	Entity	Segment	Vote	Comment
Paul B. Johnson	American Electric Power	1	Negative	AEP appreciates the additional work of the SDT to improve the EOP-001-0 R1 interpretation. In most cases, AEP agrees with the changes that have been made. However, AEP is concerned that the word choice in the response to question 2. The wording appears to limit the BA to agreements with BAs within the same interconnection. In doing so, the standard may be interpreted to nullify the use of existing agreements that cross interconnections as sufficient to meet this requirement. AEP suggests that the wording be rephrased to avoid this implication. AEP also disagrees with the need to add the phrase "that contains provisions for emergency assistance may be used to meet" since the intent of entities participating in Reserve Sharing Groups is to have Reserves (Emergency Energy) available to them in the event of such a contingency. Access to "emergency assistance" (Emergency Energy by this interpretation) is only one aspect of an emergency operations plan. There are other elements of the emergency operations plan that can be deployed in an emergency to alleviate the issue in more lengthy events. To imply in this standard that conditions exists, such as "emergency assistance may be needed for duration," is not accurate; to suggest otherwise expands the scope of the existing requirement. It is AEP's belief that to expand the scope of this requirement to the extent IESO and NBSO suggests should require a full discussion of the industry in the next version of this standard.

<sup>1</sup> The appeals process is in the Reliability Standards Development Procedure: [http://www.nerc.com/files/RSDP\\_V6\\_1\\_12Mar07.pdf](http://www.nerc.com/files/RSDP_V6_1_12Mar07.pdf).

Voter	Entity	Segment	Vote	Comment
Raj Rana	American Electric Power	3	Negative	<p>AEP appreciates the additional work of the SDT to improve the EOP-001-0 R1 interpretation. In most cases, AEP agrees with the changes that have been made. However, AEP is concerned that the word choice in the response to question 2. The wording appears to limit the BA to agreements with BAs within the same interconnection. In doing so, the standard may be interpreted to nullify the use of existing agreements that cross interconnections as sufficient to meet this requirement. AEP suggests that the wording be rephrased to avoid this implication. AEP also disagrees with the need to add the phrase "that contains provisions for emergency assistance may be used to meet" since the intent of entities participating in Reserve Sharing Groups is to have Reserves (Emergency Energy) available to them in the event of such a contingency. Access to "emergency assistance" (Emergency Energy by this interpretation) is only one aspect of an emergency operations plan. There are other elements of the emergency operations plan that can be deployed in an emergency to alleviate the issue in more lengthy events. To imply in this standard that conditions exists, such as "emergency assistance may be needed for duration," is not accurate; to suggest otherwise expands the scope of the existing requirement. It is AEP's belief that to expand the scope of this requirement to the extent IESO and NBSO suggests should require a full discussion of the industry in the next version of this standard.</p>
Edward P. Cox	AEP Marketing	6	Negative	<p>AEP appreciates the additional work of the SDT to improve the EOP-001-0 R1 interpretation. In most cases, AEP agrees with the changes that have been made. However, AEP is concerned that the word choice in the response to question 2. The wording appears to limit the BA to agreements with BAs within the same interconnection. In doing so, the standard may be interpreted to nullify the use of existing agreements that cross interconnections as sufficient to meet this requirement. AEP suggests that the wording be rephrased to avoid this implication. AEP also disagrees with the need to add the phrase "that contains provisions for emergency assistance may be used to meet" since the intent of entities participating in Reserve Sharing Groups is to have Reserves (Emergency Energy) available to them in the event of such a contingency. Access to "emergency assistance" (Emergency Energy by this interpretation) is only one aspect of an emergency operations plan. There are other elements of the emergency operations plan that can be deployed in an emergency to alleviate the issue in more lengthy events. To imply in this standard that conditions exists, such as "emergency assistance may be needed for duration," is not accurate; to suggest otherwise expands the scope of the existing requirement. It is AEP's belief that to expand the scope of this requirement to the extent IESO and NBSO suggests should require a full discussion of the industry in the next version of this standard.</p>

Voter	Entity	Segment	Vote	Comment
<p><b>Response:</b> The Operating Reliability Subcommittee (ORS) Executive Committee agrees with AEP's comment and will add the phrase, "nor does it preclude having an emergency assistance agreement across Interconnections" at the end of paragraph 2.</p> <p>The ORS Executive Committee disagrees with the second part of AEP's comment because some Reserve Sharing Groups limit access to emergency assistance.</p>				
Robert Martinko	FirstEnergy Energy Delivery	1	Affirmative	FirstEnergy Corp. supports the interpretation and has voted Affirmative. We offer the following comments: Since this interpretation is specific to Version "0" of EOP-001, it is not clear how NERC staff will integrate this interpretation into Board Approved (October 2008) Version "1" of EOP-001. We suggest that NERC add this interpretation to the Version 1 standard which was revised per the NERC project "Operate Within Interconnection Reliability Operating Limits" which is currently pending filing with FERC.
Joanne Kathleen Borrell	FirstEnergy Solutions	3	Affirmative	FirstEnergy Corp. supports the interpretation and has voted Affirmative. We offer the following comments: Since this interpretation is specific to Version "0" of EOP-001, it is not clear how NERC staff will integrate this interpretation into Board Approved (October 2008) Version "1" of EOP-001. We suggest that NERC add this interpretation to the Version 1 standard which was revised per the NERC project "Operate Within Interconnection Reliability Operating Limits" which is currently pending filing with FERC.
Douglas Hohlbaugh	Ohio Edison Company	4	Affirmative	FirstEnergy Corp. supports the interpretation and has voted Affirmative. We offer the following comments: Since this interpretation is specific to Version "0" of EOP-001, it is not clear how NERC staff will integrate this interpretation into Board Approved (October 2008) Version "1" of EOP-001. We suggest that NERC add this interpretation to the Version 1 standard which was revised per the NERC project "Operate Within Interconnection Reliability Operating Limits" which is currently pending filing with FERC.
Kenneth Dresner	FirstEnergy Solutions	5	Affirmative	FirstEnergy Corp. supports the interpretation and has voted Affirmative. We offer the following comments: Since this interpretation is specific to Version "0" of EOP-001, it is not clear how NERC staff will integrate this interpretation into Board Approved (October 2008) Version "1" of EOP-001. We suggest that NERC add this interpretation to the Version 1 standard which was revised per the NERC project "Operate Within Interconnection Reliability Operating Limits" which is currently pending filing with FERC.
Mark S Travaglianti	FirstEnergy Solutions	6	Affirmative	FirstEnergy Corp. supports the interpretation and has voted Affirmative. We offer the following comments: Since this interpretation is specific to Version "0" of EOP-001, it is not clear how NERC staff will integrate this interpretation into Board Approved (October 2008) Version "1" of EOP-001. We suggest that NERC add this interpretation to the Version 1 standard which was revised per the NERC project "Operate Within Interconnection Reliability Operating Limits" which is currently pending filing with FERC.

Voter	Entity	Segment	Vote	Comment
<b>Response:</b> The ORS Executive Committee concurs with the comments of FirstEnergy.				
Kim Warren	Independent Electricity System Operator	2	Affirmative	The IESO thanks the Executive Committee of the NERC Operating Reliability Subcommittee for the effort that went into refining this interpretation. We also wish to highlight that inclusion of the phrase “within the same interconnection” in the revised response to Question 2, seems to preclude the possibility of adjacent Balancing Authorities that are not in the same interconnection, from entering into emergency energy assistance agreements.
<b>Response:</b> The ORS Executive Committee agrees with IESO's comment and will add the phrase, “nor does it preclude having an emergency assistance agreement across Interconnections” at the end of paragraph 2.				
Kirit S. Shah	Ameren Services	1	Affirmative	While the interpretation in 3) seemingly added the opportunity to use remote BAs (“A Balancing Authority’s agreement(s) with Adjacent Balancing Authorities does (do) not preclude the Adjacent Balancing Authority from purchasing emergency energy from remote Balancing Authorities.”) it does not address the obligation currently included in the standard. To wit, if a BA intends to use a remote BA for emergency assistance (as all or part of the energy it has identified that it needs to meet reasonably anticipated emergencies), It MUST have an agreement(s) with adjacent BAs “in the path” to facilitate this emergency assistance in addition to the agreement it will have with the remote BA. This additional sentence should be added to the Interpretation as the closing sentence in 3).
Mark Peters	Ameren Services	3	Affirmative	While the interpretation in 3) seemingly added the opportunity to use remote BAs (“A Balancing Authority’s agreement(s) with Adjacent Balancing Authorities does (do) not preclude the Adjacent Balancing Authority from purchasing emergency energy from remote Balancing Authorities.”) it does not address the obligation currently included in the standard. To wit, if a BA intends to use a remote BA for emergency assistance (as all or part of the energy it has identified that it needs to meet reasonably anticipated emergencies), It MUST have an agreement(s) with adjacent BAs “in the path” to facilitate this emergency assistance in addition to the agreement it will have with the remote BA. This additional sentence should be added to the Interpretation as the closing sentence in 3).
<b>Response:</b> The interpretation requires an emergency energy agreement with at least one adjacent Balancing Authority. However, it does not preclude having additional emergency energy agreements with remote Balancing Authorities. Specifying the appropriate arrangements to deliver the emergency energy goes beyond the scope of the request for interpretation.				

## Revised Interpretation of EOP-001-0 Emergency Operations Planning Requirement R1 for the Regional Entity Compliance Managers (Project 2008-09)

Request for Interpretation Received from Regional Entity Compliance Managers on March 20, 2008:

**Request:**

*The Regional Entity Compliance Managers (RECM) request a formal interpretation of Reliability Standard EOP-001-0 — Emergency Operations Planning Requirement R1 in accordance with the Reliability Standards Development Procedure.*

- 1. What is the definition of emergency assistance in the context of this standard? What scope and time horizons, if any, are considered necessary in this definition?*
- 2. What was intended by using the adjective “adjacent” in Requirement 1? Does “adjacent Balancing Authorities” mean “All” or something else? Is there qualifying criteria to determine if a very small adjacent Balancing Authority area has enough capacity to offer emergency assistance?*
- 3. What is the definition of the word “remote” as stated in the last phrase of Requirement 1? Does remote mean every Balancing Authority who’s area does not physically touch the Balancing Authority attempting to comply with this Requirement?*
- 4. Would a Balancing Authority that participates in a Reserve Sharing Group Agreement, which meets the requirements of Reliability Standard BAL-002-0, Requirement 2, have to establish additional operating agreements to achieve compliance with Reliability Standard EOP-001-0, Requirement 1?*

**EOP-001-0**

**R1. Balancing Authorities shall have operating agreements with adjacent Balancing Authorities that shall, at a minimum, contain provisions for emergency assistance, including provisions to obtain emergency assistance from remote Balancing Authorities.**

The following revised (March 2010) interpretation of EOP-001-0 — Emergency Operations Planning Requirement R1 was developed by the Executive Committee of the NERC Operating Reliability Subcommittee:

**Interpretation of EOP-001-0 Requirement R1:**

1. In the context of this standard, emergency assistance is emergency energy. Emergency energy would normally be arranged for during the current operating day. The agreement should describe the conditions under which the emergency energy will be delivered to the responsible Balancing Authority.
2. The intent is that all Balancing Authorities, interconnected by AC ties or DC (asynchronous) ties within the same Interconnection, have emergency energy assistance agreements with at least one Adjacent Balancing Authority and have sufficient emergency energy assistance



agreements to mitigate reasonably anticipated energy emergencies. However, the standard does not require emergency energy assistance agreements with all Adjacent Balancing Authorities, nor does it preclude having an emergency assistance agreement across Interconnections.

3. A remote Balancing Authority is a Balancing Authority other than an Adjacent Balancing Authority. A Balancing Authority is not required to have arrangements in place to obtain emergency energy assistance with any remote Balancing Authorities. A Balancing Authority's agreement(s) with Adjacent Balancing Authorities does (do) not preclude the Adjacent Balancing Authority from purchasing emergency energy from remote Balancing Authorities.
4. A Reserve Sharing Group agreement that contains provisions for emergency assistance may be used to meet Requirement R1 of EOP-001-0.

## Revised Interpretation of EOP-001-0 Emergency Operations Planning Requirement R1 for the Regional Entity Compliance Managers (Project 2008-09)

Request for Interpretation Received from Regional Entity Compliance Managers on March 20, 2008:

**Request:**

*The Regional Entity Compliance Managers (RECM) request a formal interpretation of Reliability Standard EOP-001-0 — Emergency Operations Planning Requirement R1 in accordance with the Reliability Standards Development Procedure.*

- 1. What is the definition of emergency assistance in the context of this standard? What scope and time horizons, if any, are considered necessary in this definition?*
- 2. What was intended by using the adjective “adjacent” in Requirement 1? Does “adjacent Balancing Authorities” mean “All” or something else? Is there qualifying criteria to determine if a very small adjacent Balancing Authority area has enough capacity to offer emergency assistance?*
- 3. What is the definition of the word “remote” as stated in the last phrase of Requirement 1? Does remote mean every Balancing Authority who’s area does not physically touch the Balancing Authority attempting to comply with this Requirement?*
- 4. Would a Balancing Authority that participates in a Reserve Sharing Group Agreement, which meets the requirements of Reliability Standard BAL-002-0, Requirement 2, have to establish additional operating agreements to achieve compliance with Reliability Standard EOP-001-0, Requirement 1?*

**EOP-001-0**

**R1. Balancing Authorities shall have operating agreements with adjacent Balancing Authorities that shall, at a minimum, contain provisions for emergency assistance, including provisions to obtain emergency assistance from remote Balancing Authorities.**

The following revised (~~October 2009~~ [March 2010](#)) interpretation of EOP-001-0 — Emergency Operations Planning Requirement R1 was developed by the Executive Committee of the NERC Operating Reliability Subcommittee:

**Interpretation of EOP-001-0 Requirement R1:**

1. In the context of this standard, emergency assistance is emergency energy. Emergency energy would normally be arranged for during the current operating day. The agreement should describe the conditions under which the emergency energy will be delivered to the responsible Balancing Authority.
2. The intent is that all Balancing Authorities, interconnected by AC ties or DC (asynchronous) ties within the same Interconnection, have emergency energy assistance agreements with at least one Adjacent Balancing Authority and have sufficient emergency energy assistance

agreements to mitigate reasonably anticipated energy emergencies. However, the standard does not require emergency energy assistance agreements with all Adjacent Balancing Authorities; [nor does it preclude having an emergency assistance agreement across Interconnections.](#)

3. A remote Balancing Authority is a Balancing Authority other than an Adjacent Balancing Authority. A Balancing Authority is not required to have arrangements in place to obtain emergency energy assistance with any remote Balancing Authorities. A Balancing Authority's agreement(s) with Adjacent Balancing Authorities does (do) not preclude the Adjacent Balancing Authority from purchasing emergency energy from remote Balancing Authorities.
4. A Reserve Sharing Group agreement that contains provisions for emergency assistance may be used to meet Requirement R1 of EOP-001-0.



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## Standards Announcement

Ballot Pool and Pre-ballot Window

March 16–April 15, 2010

Now available at: <https://standards.nerc.net/BallotPool.aspx>

### **Project 2008-09: Interpretation of EOP-001-0 for Regional Entity Compliance Managers (Revision 3)**

An interpretation of standard EOP-001-0 — Emergency Operations Planning, Requirement R1, for the Regional Entity Compliance Managers is posted for a 30-day pre-ballot review. Registered Ballot Body members may join the ballot pool to be eligible to vote on this interpretation **until 8 a.m. Eastern on April 15, 2010**.

During the pre-ballot window, members of the ballot pool may communicate with one another by using their “ballot pool list server.” (Once the balloting begins, ballot pool members are prohibited from using the ballot pool list servers.) The list server for this ballot pool is: [bp-2008-09\\_RFI\\_RECM-Rv3\\_in@nerc.com](mailto:bp-2008-09_RFI_RECM-Rv3_in@nerc.com).

### **Next Steps**

Voting will begin shortly after the pre-ballot review closes.

### **Project Background**

The Regional Entity Compliance Managers group submitted a request for an interpretation of EOP-001-0 Requirement R1. Under Requirement R1, the Balancing Authority must have operating agreements with adjacent Balancing Authorities that contain provisions for emergency assistance, including emergency assistance from remote Balancing Authorities. The request asked for clarification on specific terminology and the applicability of Reserve Sharing Group Agreements.

This is the third revision of the interpretation. The drafting team revised the interpretation to address balloter concerns regarding the wording in the response to question 2. Balloters indicated the wording appeared to limit the Balancing Authority to agreements with Balancing Authorities within the same interconnection, which may be interpreted to nullify the use of existing agreements that cross interconnections as sufficient to meet this requirement.

The changes to the interpretation are shown in a redline version posted on the project page. The team has also posted a response to comments received during the initial ballot (conducted in November 2009) of the second revision.

Project page: [http://www.nerc.com/filez/standards/EOP-001-0\\_Interpretation\\_RECM.html](http://www.nerc.com/filez/standards/EOP-001-0_Interpretation_RECM.html)

### **Standards Development Process**

The [Reliability Standards Development Procedure](#) contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate.

*For more information or assistance,  
please contact Lauren Koller at [Lauren.Koller@nerc.net](mailto:Lauren.Koller@nerc.net)*



NORTH AMERICAN ELECTRIC  
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## Standards Announcement

### Initial Ballot Window Open

April 15–26, 2010

Now available at: <https://standards.nerc.net/CurrentBallots.aspx>

#### **Project 2008-09: Interpretation of EOP-001-0 for Regional Entity Compliance Managers (Revision 3)**

An initial ballot window for an interpretation of standard EOP-001-0 — Emergency Operations Planning, Requirement R1, for the Regional Entity Compliance Managers is now open **until 8 p.m. Eastern on April 26, 2010.**

#### **Instructions**

Members of the ballot pool associated with this project may log in and submit their votes from the following page: <https://standards.nerc.net/CurrentBallots.aspx>

#### **Next Steps**

Voting results will be posted and announced after the ballot window closes.

#### **Project Background**

The Regional Entity Compliance Managers group submitted a request for an interpretation of EOP-001-0 Requirement R1. Under Requirement R1, the Balancing Authority must have operating agreements with adjacent Balancing Authorities that contain provisions for emergency assistance, including emergency assistance from remote Balancing Authorities. The request asked for clarification on specific terminology and the applicability of Reserve Sharing Group Agreements.

This is the third revision of the interpretation. The drafting team revised the interpretation to address balloter concerns regarding the wording in the response to question 2. Balloters indicated the wording appeared to limit the Balancing Authority to agreements with Balancing Authorities within the same interconnection, which may be interpreted to nullify the use of existing agreements that cross interconnections as sufficient to meet this requirement.

The changes to the interpretation are shown in a redline version posted on the project page. The team has also posted a response to comments received during the initial ballot (conducted in November 2009) of the second revision.

Project page: [http://www.nerc.com/filez/standards/EOP-001-0\\_ Interpretation\\_RECM.html](http://www.nerc.com/filez/standards/EOP-001-0_ Interpretation_RECM.html)

#### **Standards Development Process**

The [Reliability Standards Development Procedure](#) contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate.

*For more information or assistance,  
please contact Lauren Koller at [Lauren.Koller@nerc.net](mailto:Lauren.Koller@nerc.net)*

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Ballot Results	
<b>Ballot Name:</b>	Project 2008-09 - Interpretation - RECM - Revision 3_in
<b>Ballot Period:</b>	4/15/2010 - 4/26/2010
<b>Ballot Type:</b>	Initial
<b>Total # Votes:</b>	200
<b>Total Ballot Pool:</b>	244
<b>Quorum:</b>	<b>81.97 % The Quorum has been reached</b>
<b>Weighted Segment Vote:</b>	98.64 %
<b>Ballot Results:</b>	<b>The standard will proceed to recirculation ballot.</b>

Summary of Ballot Results									
Segment	Ballot Pool	Segment Weight	Affirmative		Negative		Abstain # Votes	No Vote	
			# Votes	Fraction	# Votes	Fraction			
1 - Segment 1.		70	1	52	0.963	2	0.037	1	15
2 - Segment 2.		10	0.8	8	0.8	0	0	0	2
3 - Segment 3.		60	1	49	1	0	0	2	9
4 - Segment 4.		16	1	14	1	0	0	1	1
5 - Segment 5.		44	1	33	0.943	2	0.057	1	8
6 - Segment 6.		28	1	20	1	0	0	2	6
7 - Segment 7.		0	0	0	0	0	0	0	0
8 - Segment 8.		6	0.6	6	0.6	0	0	0	0
9 - Segment 9.		2	0.1	1	0.1	0	0	1	0
10 - Segment 10.		8	0.4	4	0.4	0	0	1	3
<b>Totals</b>		<b>244</b>	<b>6.9</b>	<b>187</b>	<b>6.806</b>	<b>4</b>	<b>0.094</b>	<b>9</b>	<b>44</b>

Individual Ballot Pool Results				
Segment	Organization	Member	Ballot	Comments
1	Allegheny Power	Rodney Phillips		
1	Ameren Services	Kirit S. Shah	Affirmative	
1	American Electric Power	Paul B. Johnson	Affirmative	
1	American Transmission Company, LLC	Jason Shaver		
1	Avista Corp.	Scott Kinney	Affirmative	
1	BC Transmission Corporation	Gordon Rawlings	Affirmative	
1	Beaches Energy Services	Joseph S. Stonecipher	Affirmative	
1	Black Hills Corp	Eric Egge		

1	Bonneville Power Administration	Donald S. Watkins	Affirmative	
1	Brazos Electric Power Cooperative, Inc.	Tony Kroskey	Affirmative	
1	CenterPoint Energy	Paul Rocha	Affirmative	
1	Central Maine Power Company	Brian Conroy	Affirmative	
1	City of Vero Beach	Randall McCamish		
1	City Utilities of Springfield, Missouri	Jeff Knottek		
1	Cleco Power LLC	Danny McDaniel		
1	Consolidated Edison Co. of New York	Christopher L de Graffenried	Affirmative	
1	Deseret Power	James Tucker		
1	Duke Energy Carolina	Douglas E. Hils	Affirmative	
1	E.ON U.S. LLC	Larry Monday		
1	East Kentucky Power Coop.	George S. Carruba	Affirmative	
1	Empire District Electric Co.	Ralph Frederick Meyer	Affirmative	<a href="#">View</a>
1	Entergy Corporation	George R. Bartlett	Affirmative	
1	FirstEnergy Energy Delivery	Robert Martinko	Affirmative	
1	Florida Keys Electric Cooperative Assoc.	Dennis Minton		
1	Great River Energy	Gordon Pietsch	Affirmative	
1	Hoosier Energy Rural Electric Cooperative, Inc.	Robert Solomon		
1	Hydro One Networks, Inc.	Ajay Garg	Affirmative	
1	Idaho Power Company	Ronald D. Schellberg	Affirmative	
1	ITC Transmission	Elizabeth Howell	Affirmative	
1	Kansas City Power & Light Co.	Michael Gammon	Affirmative	
1	Keys Energy Services	Stan T. Rzad	Affirmative	
1	Lakeland Electric	Larry E Watt	Affirmative	
1	Lee County Electric Cooperative	John W Delucca	Abstain	
1	Lincoln Electric System	Doug Bantam		
1	Long Island Power Authority	Jonathan Appelbaum	Affirmative	
1	Manitoba Hydro	Michelle Rheault	Affirmative	
1	MEAG Power	Danny Dees	Negative	
1	MidAmerican Energy Co.	Terry Harbour	Affirmative	
1	Minnesota Power, Inc.	Randi Woodward	Affirmative	
1	National Grid	Saurabh Saksena		
1	New York Power Authority	Arnold J. Schuff		
1	New York State Electric & Gas Corp.	Henry G. Masti		
1	Northeast Utilities	David H. Boguslawski	Affirmative	
1	Northern Indiana Public Service Co.	Kevin M Largura	Affirmative	
1	Ohio Valley Electric Corp.	Robert Matthey	Affirmative	
1	Orlando Utilities Commission	Brad Chase	Affirmative	
1	Otter Tail Power Company	Lawrence R. Larson	Affirmative	
1	PacifiCorp	Mark Sampson	Affirmative	
1	Portland General Electric Co.	Frank F. Afranji	Affirmative	
1	Potomac Electric Power Co.	Richard J. Kafka	Affirmative	
1	PowerSouth Energy Cooperative	Larry D. Avery	Negative	
1	Progress Energy Carolinas	Sammy Roberts	Affirmative	
1	Public Service Electric and Gas Co.	Kenneth D. Brown	Affirmative	
1	Puget Sound Energy, Inc.	Catherine Koch	Affirmative	
1	Sacramento Municipal Utility District	Tim Kelley	Affirmative	
1	Salt River Project	Robert Kondziolka	Affirmative	
1	Santee Cooper	Terry L. Blackwell	Affirmative	
1	SCE&G	Henry Delk, Jr.	Affirmative	
1	Seattle City Light	Pawel Krupa	Affirmative	
1	Sierra Pacific Power Co.	Richard Salgo	Affirmative	
1	South Texas Electric Cooperative	Richard McLeon	Affirmative	
1	Southern California Edison Co.	Dana Cabbell	Affirmative	
1	Southern Company Services, Inc.	Horace Stephen Williamson	Affirmative	
1	Southwest Transmission Cooperative, Inc.	James L. Jones	Affirmative	
1	Southwestern Power Administration	Gary W Cox	Affirmative	
1	Tri-State G & T Association Inc.	Keith V. Carman	Affirmative	
1	Tucson Electric Power Co.	John Tolo		
1	Westar Energy	Allen Klassen	Affirmative	
1	Western Area Power Administration	Brandy A Dunn	Affirmative	
1	Xcel Energy, Inc.	Gregory L Pieper	Affirmative	
2	Alberta Electric System Operator	Jason L. Murray	Affirmative	
2	BC Transmission Corporation	Faramarz Amjadi	Affirmative	
2	California ISO	Timothy VanBlaricom		
2	Electric Reliability Council of Texas, Inc.	Chuck B Manning	Affirmative	

2	Independent Electricity System Operator	Kim Warren	Affirmative	
2	ISO New England, Inc.	Kathleen Goodman	Affirmative	
2	Midwest ISO, Inc.	Jason L Marshall	Affirmative	
2	New Brunswick System Operator	Alden Briggs	Affirmative	
2	PJM Interconnection, L.L.C.	Tom Bowe	Affirmative	
2	Southwest Power Pool	Charles H Yeung		
3	Alabama Power Company	Richard J. Mandes	Affirmative	
3	Allegheny Power	Bob Reeping		
3	Ameren Services	Mark Peters	Affirmative	
3	American Electric Power	Raj Rana	Affirmative	
3	Atlantic City Electric Company	James V. Petrella	Affirmative	
3	BC Hydro and Power Authority	Pat G. Harrington	Abstain	
3	Blue Ridge Power Agency	Duane S. Dahlquist		
3	Bonneville Power Administration	Rebecca Berdahl	Affirmative	
3	City of Bartow, Florida	Matt Culverhouse	Affirmative	
3	City of Clewiston	Lynne Mila	Affirmative	
3	City of Farmington	Linda R. Jacobson		
3	City of Green Cove Springs	Gregg R Griffin	Affirmative	
3	City of Leesburg	Phil Janik		
3	Consolidated Edison Co. of New York	Peter T Yost	Affirmative	
3	Consumers Energy	David A. Lapinski	Affirmative	
3	Cowlitz County PUD	Russell A Noble	Affirmative	
3	Delmarva Power & Light Co.	Michael R. Mayer	Affirmative	
3	Detroit Edison Company	Kent Kujala	Affirmative	
3	Dominion Resources Services	Michael F Gildea	Abstain	
3	Duke Energy Carolina	Henry Ernst-Jr	Affirmative	
3	East Kentucky Power Coop.	Sally Witt	Affirmative	
3	Entergy Services, Inc.	Matt Wolf	Affirmative	
3	FirstEnergy Solutions	Kevin Querry	Affirmative	<a href="#">View</a>
3	Florida Municipal Power Agency	Joe McKinney		
3	Florida Power Corporation	Lee Schuster	Affirmative	
3	Georgia Power Company	Anthony L Wilson	Affirmative	
3	Georgia System Operations Corporation	R Scott S. Barfield-McGinnis	Affirmative	
3	Grays Harbor PUD	Wesley W Gray		
3	Great River Energy	Sam Kokkinen	Affirmative	
3	Gulf Power Company	Gwen S Frazier	Affirmative	
3	Hydro One Networks, Inc.	Michael D. Penstone	Affirmative	
3	JEA	Garry Baker		
3	Kansas City Power & Light Co.	Charles Locke	Affirmative	
3	Kissimmee Utility Authority	Gregory David Woessner	Affirmative	
3	Lakeland Electric	Mace Hunter	Affirmative	
3	Lincoln Electric System	Bruce Merrill	Affirmative	
3	Louisville Gas and Electric Co.	Charles A. Freibert	Affirmative	
3	Manitoba Hydro	Greg C Parent	Affirmative	
3	MidAmerican Energy Co.	Thomas C. Mielnik	Affirmative	
3	Mississippi Power	Don Horsley	Affirmative	
3	New York Power Authority	Marilyn Brown	Affirmative	
3	Niagara Mohawk (National Grid Company)	Michael Schiavone	Affirmative	
3	Northern Indiana Public Service Co.	William SeDoris	Affirmative	
3	Ocala Electric Utility	David T. Anderson	Affirmative	
3	Orlando Utilities Commission	Ballard Keith Muters	Affirmative	
3	PacifiCorp	John Apperson	Affirmative	
3	Platte River Power Authority	Terry L Baker	Affirmative	
3	Potomac Electric Power Co.	Robert Reuter	Affirmative	
3	Progress Energy Carolinas	Sam Waters	Affirmative	
3	Public Service Electric and Gas Co.	Jeffrey Mueller	Affirmative	
3	Public Utility District No. 2 of Grant County	Greg Lange		
3	Sacramento Municipal Utility District	James Leigh-Kendall	Affirmative	
3	Salt River Project	John T. Underhill	Affirmative	
3	Santee Cooper	Zack Dusenbury	Affirmative	
3	Seattle City Light	Dana Wheelock	Affirmative	
3	South Carolina Electric & Gas Co.	Hubert C. Young	Affirmative	
3	Southern California Edison Co.	David Schiada	Affirmative	
3	Tampa Electric Co.	Ronald L Donahey		
3	Wisconsin Electric Power Marketing	James R. Keller	Affirmative	
3	Xcel Energy, Inc.	Michael Ibold	Affirmative	
4	Alliant Energy Corp. Services, Inc.	Kenneth Goldsmith	Affirmative	



4	City of Clewiston	Kevin McCarthy	Affirmative	
4	City of New Smyrna Beach Utilities Commission	Timothy Beyrle	Affirmative	
4	Consumers Energy	David Frank Ronk	Affirmative	
4	Detroit Edison Company	Daniel Herring	Affirmative	
4	Florida Municipal Power Agency	Frank Gaffney	Affirmative	
4	Georgia System Operations Corporation	Guy Andrews	Affirmative	
4	Integrus Energy Group, Inc.	Christopher Plante	Abstain	
4	Madison Gas and Electric Co.	Joseph G. DePoorter	Affirmative	
4	Ohio Edison Company	Douglas Hohlbaugh	Affirmative	
4	Sacramento Municipal Utility District	Mike Ramirez	Affirmative	
4	Seattle City Light	Hao Li	Affirmative	
4	Seminole Electric Cooperative, Inc.	Steven R Wallace	Affirmative	
4	South Mississippi Electric Power Association	Steve McElhaney	Affirmative	
4	Tacoma Public Utilities	Keith Morissette		
4	Wisconsin Energy Corp.	Anthony Jankowski	Affirmative	
5	AEP Service Corp.	Brock Ondayko	Affirmative	
5	Amerenue	Sam Dwyer	Affirmative	
5	Avista Corp.	Edward F. Groce	Affirmative	
5	Black Hills Corp	George Tatar	Affirmative	
5	Bonneville Power Administration	Francis J. Halpin	Affirmative	
5	City of Tallahassee	Alan Gale	Affirmative	
5	Conectiv Energy Supply, Inc.	Kara Dundas	Affirmative	
5	Consolidated Edison Co. of New York	Edwin E Thompson		
5	Consumers Energy	James B Lewis	Affirmative	
5	Detroit Edison Company	Ronald W. Bauer		
5	East Kentucky Power Coop.	Stephen Ricker	Affirmative	
5	Entergy Corporation	Stanley M Jaskot	Affirmative	
5	FirstEnergy Solutions	Kenneth Dresner	Affirmative	
5	Florida Municipal Power Agency	David Schumann		
5	Great River Energy	Cynthia E Sulzer	Affirmative	
5	JEA	Donald Gilbert	Affirmative	
5	Kansas City Power & Light Co.	Scott Heidtbrink	Affirmative	
5	Kissimmee Utility Authority	Mike Blough		
5	Lakeland Electric	Thomas J Trickey	Affirmative	
5	Lincoln Electric System	Dennis Florom	Affirmative	
5	Louisville Gas and Electric Co.	Charlie Martin		
5	Manitoba Hydro	Mark Aikens	Affirmative	
5	MidAmerican Energy Co.	Christopher Schneider	Affirmative	
5	New York Power Authority	Gerald Mannarino	Affirmative	
5	Northern Indiana Public Service Co.	Michael K Wilkerson	Affirmative	
5	Orlando Utilities Commission	Richard Kinan	Affirmative	
5	PacifiCorp	Sandra L. Shaffer		
5	Portland General Electric Co.	Gary L Tingley		
5	PPL Generation LLC	Mark A. Heimbach	Affirmative	
5	Progress Energy Carolinas	Wayne Lewis	Affirmative	
5	PSEG Power LLC	David Murray	Affirmative	
5	RRI Energy	Thomas J. Bradish	Affirmative	
5	Sacramento Municipal Utility District	Bethany Wright	Affirmative	
5	Salt River Project	Glen Reeves	Affirmative	
5	Seattle City Light	Michael J. Haynes	Abstain	
5	Seminole Electric Cooperative, Inc.	Brenda K. Atkins	Affirmative	
5	South Carolina Electric & Gas Co.	Richard Jones	Affirmative	
5	Tampa Electric Co.	RJames Rocha		
5	Tenaska, Inc.	Scott M. Helyer	Affirmative	
5	U.S. Army Corps of Engineers Northwestern Division	Karl Bryan	Negative	<a href="#">View</a>
5	U.S. Bureau of Reclamation	Martin Bauer P.E.	Negative	<a href="#">View</a>
5	Wisconsin Electric Power Co.	Linda Horn	Affirmative	
5	Wisconsin Public Service Corp.	Leonard Rentmeester	Affirmative	
5	Xcel Energy, Inc.	Liam Noailles	Affirmative	
6	AEP Marketing	Edward P. Cox	Affirmative	
6	Black Hills Corp	Tyson Taylor		
6	Bonneville Power Administration	Brenda S. Anderson	Affirmative	
6	Consolidated Edison Co. of New York	Nickesha P Carrol	Affirmative	
6	Dominion Resources, Inc.	Louis S Slade	Abstain	
6	Duke Energy Carolina	Walter Yeager	Affirmative	

6	Entergy Services, Inc.	Terri F Benoit	
6	FirstEnergy Solutions	Mark S Travaglianti	Affirmative
6	Florida Municipal Power Pool	Thomas E Washburn	Affirmative
6	Florida Power & Light Co.	Silvia P Mitchell	
6	Kansas City Power & Light Co.	Thomas Saitta	
6	Lakeland Electric	Paul Shippis	Affirmative
6	Lincoln Electric System	Eric Ruskamp	Affirmative
6	Louisville Gas and Electric Co.	Daryn Barker	Affirmative
6	Manitoba Hydro	Daniel Prowse	Affirmative
6	New York Power Authority	Thomas Papadopoulos	Affirmative
6	Northern Indiana Public Service Co.	Joseph O'Brien	Affirmative
6	Omaha Public Power District	David Ried	Abstain
6	PacifiCorp	Gregory D Maxfield	Affirmative
6	Progress Energy	James Eckelkamp	Affirmative
6	PSEG Energy Resources & Trade LLC	James D. Hebson	
6	RRI Energy	Trent Carlson	Affirmative
6	Santee Cooper	Suzanne Ritter	Affirmative
6	Seattle City Light	Dennis Sismaet	Affirmative
6	Seminole Electric Cooperative, Inc.	Trudy S. Novak	Affirmative
6	South Carolina Electric & Gas Co.	Matt H Bullard	Affirmative
6	Western Area Power Administration - UGP Marketing	John Stonebarger	Affirmative
6	Xcel Energy, Inc.	David F. Lemmons	
8		Roger C Zaklukiewicz	Affirmative
8		James A Maenner	Affirmative
8	JDRJC Associates	Jim D. Cyrulewski	Affirmative
8	Power Energy Group LLC	Peggy Abbadini	Affirmative
8	Shafer, Kline, & Warren Inc. (SKW)	Michael J Bequette, P.E.	Affirmative
8	Volkman Consulting, Inc.	Terry Volkman	Affirmative
9	California Energy Commission	William Mitchell Chamberlain	Abstain
9	Commonwealth of Massachusetts Department of Public Utilities	Donald E. Nelson	Affirmative
10	Electric Reliability Council of Texas, Inc.	Kent Saathoff	Affirmative
10	Florida Reliability Coordinating Council	Linda Campbell	Abstain
10	Midwest Reliability Organization	Dan R. Schoenecker	Affirmative
10	New York State Reliability Council	Alan Adamson	Affirmative
10	Northeast Power Coordinating Council, Inc.	Guy V. Zito	Affirmative
10	ReliabilityFirst Corporation	Jacque Smith	
10	SERC Reliability Corporation	Carter B Edge	
10	Western Electricity Coordinating Council	Louise McCarren	

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NORTH AMERICAN ELECTRIC  
RELIABILITY CORPORATION

## Standards Announcement

### Initial Ballot Results

Now available at: <https://standards.nerc.net/Ballots.aspx>

#### **Project 2008-09: Interpretation of EOP-001-0 R1 by Regional Entity Compliance Managers**

The initial ballot window for an interpretation of standard EOP-001-0 — Emergency Operations Planning, Requirement R1, for the Regional Entity Compliance Managers ended on April 26, 2010.

#### **Ballot Results**

Voting statistics are listed below, and the [Ballot Results](#) Web page provides a link to the detailed results:

Quorum: 81.97 %  
Approval: 98.64 %

Since at least one negative ballot included a comment, these results are not final. A second (or recirculation) ballot must be conducted. Ballot criteria are listed at the end of the announcement.

#### **Next Steps**

As part of the recirculation ballot process, the drafting team must draft and post responses to voter comments. The drafting team will also determine whether or not to make revisions to the balloted item(s). Should the team decide to make revisions, the revised item(s) will return to the initial ballot phase.

#### **Project Background**

The Regional Entity Compliance Managers group submitted a request for an interpretation of EOP-001-0 Requirement R1. Under Requirement R1, the Balancing Authority must have operating agreements with adjacent Balancing Authorities that contain provisions for emergency assistance, including emergency assistance from remote Balancing Authorities. The request asked for clarification on specific terminology and the applicability of Reserve Sharing Group Agreements.

This is the third revision of the interpretation. The drafting team revised the interpretation to address balloter concerns regarding the wording in the response to question 2. Balloters indicated the wording appeared to limit the Balancing Authority to agreements with Balancing Authorities within the same interconnection, which may be interpreted to nullify the use of existing agreements that cross interconnections as sufficient to meet this requirement.

The changes to the interpretation are shown in a redline version posted on the project page. The team has also posted a response to comments received during the initial ballot (conducted in November 2009) of the second revision.

More information is available on the project page: <http://www.nerc.com/filez/standards/EOP-001-0 Interpretation RECM.html>

#### **Standards Development Process**

The [Reliability Standards Development Procedure](#) contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate.

### **Ballot Criteria**

Approval requires both a (1) quorum, which is established by at least 75% of the members of the ballot pool for submitting either an affirmative vote, a negative vote, or an abstention, and (2) A two-thirds majority of the weighted segment votes cast must be affirmative; the number of votes cast is the sum of affirmative and negative votes, excluding abstentions and non-responses. If there are no negative votes with reasons from the first ballot, the results of the first ballot shall stand. If, however, one or more members submit negative votes with reasons, a second ballot shall be conducted.

*For more information or assistance,  
please contact Lauren Koller at [Lauren.Koller@nerc.net](mailto:Lauren.Koller@nerc.net)*

## 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](mailto:herb.schrayshuen@nerc.net). In addition, there is a NERC Reliability Standards Appeals Process.<sup>1</sup>

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.
<b>Response:</b> The ORS Executive Committee thanks Empire District Electric Co. its comment.				
Kevin Query	FirstEnergy Solutions	3	Affirmative	No Comment
<b>Response:</b> 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.
<b>Response:</b> 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

<sup>1</sup> The appeals process is in the Reliability Standards Development Procedure: [http://www.nerc.com/files/RSDP\\_V6\\_1\\_12Mar07.pdf](http://www.nerc.com/files/RSDP_V6_1_12Mar07.pdf).

Voter	Entity	Segment	Vote	Comment
				<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><b>Response:</b> 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>				

## Revised Interpretation of EOP-001-0 Emergency Operations Planning Requirement R1 for the Regional Entity Compliance Managers (Project 2008-09)

Request for Interpretation Received from Regional Entity Compliance Managers on March 20, 2008:

**Request:**

*The Regional Entity Compliance Managers (RECM) request a formal interpretation of Reliability Standard EOP-001-0 — Emergency Operations Planning Requirement R1 in accordance with the Reliability Standards Development Procedure.*

- 1. What is the definition of emergency assistance in the context of this standard? What scope and time horizons, if any, are considered necessary in this definition?*
- 2. What was intended by using the adjective “adjacent” in Requirement 1? Does “adjacent Balancing Authorities” mean “All” or something else? Is there qualifying criteria to determine if a very small adjacent Balancing Authority area has enough capacity to offer emergency assistance?*
- 3. What is the definition of the word “remote” as stated in the last phrase of Requirement 1? Does remote mean every Balancing Authority who’s area does not physically touch the Balancing Authority attempting to comply with this Requirement?*
- 4. Would a Balancing Authority that participates in a Reserve Sharing Group Agreement, which meets the requirements of Reliability Standard BAL-002-0, Requirement 2, have to establish additional operating agreements to achieve compliance with Reliability Standard EOP-001-0, Requirement 1?*

**EOP-001-0**

**R1. Balancing Authorities shall have operating agreements with adjacent Balancing Authorities that shall, at a minimum, contain provisions for emergency assistance, including provisions to obtain emergency assistance from remote Balancing Authorities.**

The following revised (March 2010) interpretation of EOP-001-0 — Emergency Operations Planning Requirement R1 was developed by the Executive Committee of the NERC Operating Reliability Subcommittee:

**Interpretation of EOP-001-0 Requirement R1:**

1. In the context of this standard, emergency assistance is emergency energy. Emergency energy would normally be arranged for during the current operating day. The agreement should describe the conditions under which the emergency energy will be delivered to the responsible Balancing Authority.
2. The intent is that all Balancing Authorities, interconnected by AC ties or DC (asynchronous) ties within the same Interconnection, have emergency energy assistance agreements with at least one Adjacent Balancing Authority and have sufficient emergency energy assistance

agreements to mitigate reasonably anticipated energy emergencies. However, the standard does not require emergency energy assistance agreements with all Adjacent Balancing Authorities, nor does it preclude having an emergency assistance agreement across Interconnections.

3. A remote Balancing Authority is a Balancing Authority other than an Adjacent Balancing Authority. A Balancing Authority is not required to have arrangements in place to obtain emergency energy assistance with any remote Balancing Authorities. A Balancing Authority's agreement(s) with Adjacent Balancing Authorities does (do) not preclude the Adjacent Balancing Authority from purchasing emergency energy from remote Balancing Authorities.
4. A Reserve Sharing Group agreement that contains provisions for emergency assistance may be used to meet Requirement R1 of EOP-001-0.



## Standards Announcement Recirculation Ballot Window Open October 4–14, 2010

Now available at: <https://standards.nerc.net/CurrentBallots.aspx>

### **Interpretation of EOP-001-0 Emergency Operations Planning Requirement R1 for the Regional Entity Compliance Managers (Project 2008-09)**

A recirculation ballot window for an interpretation of EOP-001-0 Requirement R1 for the Regional Entity Compliance Managers is now open **until 8 p.m. EDT on October 14, 2010**.

#### **Project Background**

The Regional Entity Compliance Managers group submitted a request for an interpretation of EOP-001-0 Requirement R1. Under Requirement R1, the Balancing Authority must have operating agreements with adjacent Balancing Authorities that contain provisions for emergency assistance, including emergency assistance from remote Balancing Authorities. The request asked for clarification on specific terminology and the applicability of Reserve Sharing Group Agreements.

#### **Recirculation Ballot Process**

The Standards Committee encourages all members of the Ballot Pool to review the consideration of comments submitted with the initial ballots. In the recirculation ballot, votes are counted by exception only. If a Ballot Pool member does not submit a revision to that member's original vote, the vote remains the same as in the first ballot. Members of the ballot pool may:

- Reconsider and change their vote from the first ballot
- Vote in the second ballot even if they did not vote on the first ballot
- Take no action if they do not want to change their original vote

#### **Transition from Reliability Standards Development Procedure Version 7 to Standard Processes Manual**

Under the Reliability Standards Development Procedure Version 7, interpretations did not have any comment period and were posted for ballot once they were drafted. Under the Standard Processes Manual, each interpretation is posted for a 30-day formal comment period; then the drafting team responds to comments; then the interpretation (revised if needed) is posted for a 45-day formal comment period conducted in parallel with an initial ballot. If there are no significant changes to the interpretation and the initial ballot sufficient affirmative votes for approval, then the interpretation proceeds to a recirculation ballot.

The addition of a comment period before the pre-ballot review period and the addition of a comment period in parallel with the initial ballot, are steps that were added to the process based on stakeholder comments indicating that interpretations needed more stakeholder input before being finalized.

This interpretation had already been through an initial ballot when the Standard Processes Manual was

approved, and no changes were made to the interpretation following the initial ballot; thus, this interpretation is moving forward for a recirculation ballot.

### **Next Steps**

Voting results will be posted and announced after the recirculation ballot window closes.

### **Standards Process**

The [Standard Processes Manual](#) contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate.

*For more information or assistance, please contact Monica Benson,  
Standards Process Administrator, at [monica.benson@nerc.net](mailto:monica.benson@nerc.net) or at 609.452.8060.*

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Ballot Results	
<b>Ballot Name:</b>	Project 2008-09 - Interpretation - RECM - Revision 3_rc
<b>Ballot Period:</b>	10/4/2010 - 10/14/2010
<b>Ballot Type:</b>	recirculation
<b>Total # Votes:</b>	215
<b>Total Ballot Pool:</b>	244
<b>Quorum:</b>	<b>88.11 % The Quorum has been reached</b>
<b>Weighted Segment Vote:</b>	99.14 %
<b>Ballot Results:</b>	<b>The Standard has Passed</b>

Summary of Ballot Results									
Segment	Ballot Pool	Segment Weight	Affirmative		Negative		Abstain # Votes	No Vote	
			# Votes	Fraction	# Votes	Fraction			
1 - Segment 1.		70	1	56	0.966	2	0.034	1	11
2 - Segment 2.		10	0.9	9	0.9	0	0	0	1
3 - Segment 3.		60	1	50	1	0	0	3	7
4 - Segment 4.		16	1	13	1	0	0	3	0
5 - Segment 5.		44	1	35	0.972	1	0.028	3	5
6 - Segment 6.		28	1	23	1	0	0	2	3
7 - Segment 7.		0	0	0	0	0	0	0	0
8 - Segment 8.		6	0.6	6	0.6	0	0	0	0
9 - Segment 9.		2	0.2	2	0.2	0	0	0	0
10 - Segment 10.		8	0.5	5	0.5	0	0	1	2
<b>Totals</b>		<b>244</b>	<b>7.2</b>	<b>199</b>	<b>7.138</b>	<b>3</b>	<b>0.062</b>	<b>13</b>	<b>29</b>

Individual Ballot Pool Results				
Segment	Organization	Member	Ballot	Comments
1	Allegheny Power	Rodney Phillips		
1	Ameren Services	Kirit S. Shah	Affirmative	
1	American Electric Power	Paul B. Johnson	Affirmative	
1	American Transmission Company, LLC	Jason Shaver		
1	Avista Corp.	Scott Kinney	Affirmative	
1	BC Transmission Corporation	Gordon Rawlings	Affirmative	
1	Beaches Energy Services	Joseph S. Stonecipher	Affirmative	
1	Black Hills Corp	Eric Egge		

1	Bonneville Power Administration	Donald S. Watkins	Affirmative
1	Brazos Electric Power Cooperative, Inc.	Tony Kroskey	Affirmative
1	CenterPoint Energy	Paul Rocha	Affirmative
1	Central Maine Power Company	Brian Conroy	Affirmative
1	City of Vero Beach	Randall McCamish	Affirmative
1	City Utilities of Springfield, Missouri	Jeff Knottek	
1	Cleco Power LLC	Danny McDaniel	
1	Consolidated Edison Co. of New York	Christopher L de Graffenried	Affirmative
1	Deseret Power	James Tucker	Affirmative
1	Duke Energy Carolina	Douglas E. Hils	Affirmative
1	E.ON U.S.	Larry Monday	Affirmative
1	East Kentucky Power Coop.	George S. Carruba	Affirmative
1	Empire District Electric Co.	Ralph Frederick Meyer	Affirmative
1	Entergy Corporation	George R. Bartlett	Affirmative
1	FirstEnergy Energy Delivery	Robert Martinko	Affirmative
1	Florida Keys Electric Cooperative Assoc.	Dennis Minton	Affirmative
1	Great River Energy	Gordon Pietsch	Affirmative
1	Hoosier Energy Rural Electric Cooperative, Inc.	Robert Solomon	
1	Hydro One Networks, Inc.	Ajay Garg	Affirmative
1	Idaho Power Company	Ronald D. Schellberg	Affirmative
1	ITC Transmission	Elizabeth Howell	Affirmative
1	Kansas City Power & Light Co.	Michael Gammon	Affirmative
1	Keys Energy Services	Stan T. Rzad	Affirmative
1	Lakeland Electric	Larry E Watt	Affirmative
1	Lee County Electric Cooperative	John W Delucca	Abstain
1	Lincoln Electric System	Doug Bantam	
1	Long Island Power Authority	Jonathan Appelbaum	Affirmative
1	Manitoba Hydro	Michelle Rheault	Affirmative
1	MEAG Power	Danny Dees	Negative
1	MidAmerican Energy Co.	Terry Harbour	Affirmative
1	Minnesota Power, Inc.	Randi Woodward	Affirmative
1	National Grid	Saurabh Saksena	
1	New York Power Authority	Arnold J. Schuff	
1	New York State Electric & Gas Corp.	Henry G. Masti	
1	Northeast Utilities	David H. Boguslawski	Affirmative
1	Northern Indiana Public Service Co.	Kevin M Largura	Affirmative
1	Ohio Valley Electric Corp.	Robert Matthey	Affirmative
1	Orlando Utilities Commission	Brad Chase	Affirmative
1	Otter Tail Power Company	Lawrence R. Larson	Affirmative
1	PacifiCorp	Mark Sampson	Affirmative
1	Portland General Electric Co.	Frank F. Afranji	Affirmative
1	Potomac Electric Power Co.	Richard J Kafka	Affirmative
1	PowerSouth Energy Cooperative	Larry D. Avery	Negative
1	Progress Energy Carolinas	Sammy Roberts	Affirmative
1	Public Service Electric and Gas Co.	Kenneth D. Brown	Affirmative
1	Puget Sound Energy, Inc.	Catherine Koch	Affirmative
1	Sacramento Municipal Utility District	Tim Kelley	Affirmative
1	Salt River Project	Robert Kondziolka	Affirmative
1	Santee Cooper	Terry L. Blackwell	Affirmative
1	SCE&G	Henry Delk, Jr.	Affirmative
1	Seattle City Light	Pawel Krupa	Affirmative
1	Sierra Pacific Power Co.	Rich Salgo	Affirmative
1	South Texas Electric Cooperative	Richard McLeon	Affirmative
1	Southern California Edison Co.	Dana Cabbell	Affirmative
1	Southern Company Services, Inc.	Horace Stephen Williamson	Affirmative
1	Southwest Transmission Cooperative, Inc.	James L. Jones	Affirmative
1	Southwestern Power Administration	Gary W Cox	Affirmative
1	Tri-State G & T Association, Inc.	Keith V. Carman	Affirmative
1	Tucson Electric Power Co.	John Tolo	
1	Westar Energy	Allen Klassen	Affirmative
1	Western Area Power Administration	Brandy A Dunn	Affirmative
1	Xcel Energy, Inc.	Gregory L Pieper	Affirmative
2	Alberta Electric System Operator	Jason L. Murray	Affirmative
2	BC Transmission Corporation	Faramarz Amjadi	Affirmative
2	California ISO	Timothy VanBlaricom	
2	Electric Reliability Council of Texas, Inc.	Chuck B Manning	Affirmative

2	Independent Electricity System Operator	Kim Warren	Affirmative	
2	ISO New England, Inc.	Kathleen Goodman	Affirmative	
2	Midwest ISO, Inc.	Jason L Marshall	Affirmative	
2	New Brunswick System Operator	Alden Briggs	Affirmative	
2	PJM Interconnection, L.L.C.	Tom Bowe	Affirmative	
2	Southwest Power Pool	Charles H Yeung	Affirmative	
3	Alabama Power Company	Richard J. Mandes	Affirmative	
3	Allegheny Power	Bob Reeping		
3	Ameren Services	Mark Peters	Affirmative	
3	American Electric Power	Raj Rana	Affirmative	
3	Atlantic City Electric Company	James V. Petrella	Affirmative	
3	BC Hydro and Power Authority	Pat G. Harrington	Affirmative	
3	Blue Ridge Power Agency	Duane S. Dahlquist		
3	Bonneville Power Administration	Rebecca Berdahl	Affirmative	
3	City of Bartow, Florida	Matt Culverhouse	Affirmative	
3	City of Clewiston	Lynne Mila	Affirmative	
3	City of Farmington	Linda R. Jacobson	Affirmative	
3	City of Green Cove Springs	Gregg R Griffin	Abstain	
3	City of Leesburg	Phil Janik	Affirmative	
3	Consolidated Edison Co. of New York	Peter T Yost	Affirmative	
3	Consumers Energy	David A. Lapinski	Affirmative	
3	Cowlitz County PUD	Russell A Noble	Affirmative	
3	Delmarva Power & Light Co.	Michael R. Mayer	Affirmative	
3	Detroit Edison Company	Kent Kujala	Affirmative	
3	Dominion Resources Services	Michael F Gildea	Abstain	
3	Duke Energy Carolina	Henry Ernst-Jr	Affirmative	
3	East Kentucky Power Coop.	Sally Witt	Affirmative	
3	Entergy Services, Inc.	Matt Wolf	Affirmative	
3	FirstEnergy Solutions	Kevin Querry	Affirmative	<a href="#">View</a>
3	Florida Municipal Power Agency	Joe McKinney		
3	Florida Power Corporation	Lee Schuster	Abstain	
3	Georgia Power Company	Anthony L Wilson	Affirmative	
3	Georgia System Operations Corporation	R Scott S. Barfield-McGinnis	Affirmative	
3	Grays Harbor PUD	Wesley W Gray		
3	Great River Energy	Sam Kokkinen	Affirmative	
3	Gulf Power Company	Gwen S Frazier	Affirmative	
3	Hydro One Networks, Inc.	Michael D. Penstone	Affirmative	
3	JEA	Garry Baker		
3	Kansas City Power & Light Co.	Charles Locke	Affirmative	
3	Kissimmee Utility Authority	Gregory David Woessner	Affirmative	
3	Lakeland Electric	Mace Hunter	Affirmative	
3	Lincoln Electric System	Bruce Merrill	Affirmative	
3	Louisville Gas and Electric Co.	Charles A. Freibert	Affirmative	
3	Manitoba Hydro	Greg C Parent	Affirmative	
3	MidAmerican Energy Co.	Thomas C. Mielnik	Affirmative	
3	Mississippi Power	Don Horsley	Affirmative	
3	New York Power Authority	Marilyn Brown	Affirmative	
3	Niagara Mohawk (National Grid Company)	Michael Schiavone	Affirmative	
3	Northern Indiana Public Service Co.	William SeDoris	Affirmative	
3	Ocala Electric Utility	David T. Anderson	Affirmative	
3	Orlando Utilities Commission	Ballard Keith Muters	Affirmative	
3	PacifiCorp	John Apperson	Affirmative	
3	Platte River Power Authority	Terry L Baker	Affirmative	
3	Potomac Electric Power Co.	Robert Reuter	Affirmative	
3	Progress Energy Carolinas	Sam Waters	Affirmative	
3	Public Service Electric and Gas Co.	Jeffrey Mueller	Affirmative	
3	Public Utility District No. 2 of Grant County	Greg Lange		
3	Sacramento Municipal Utility District	James Leigh-Kendall	Affirmative	
3	Salt River Project	John T. Underhill	Affirmative	
3	Santee Cooper	Zack Dusenbury	Affirmative	
3	Seattle City Light	Dana Wheelock	Affirmative	
3	South Carolina Electric & Gas Co.	Hubert C. Young	Affirmative	
3	Southern California Edison Co.	David Schiada	Affirmative	
3	Tampa Electric Co.	Ronald L Donahey		
3	Wisconsin Electric Power Marketing	James R. Keller	Affirmative	
3	Xcel Energy, Inc.	Michael Ibold	Affirmative	
4	Alliant Energy Corp. Services, Inc.	Kenneth Goldsmith	Abstain	

4	City of Clewiston	Kevin McCarthy	Affirmative	
4	City of New Smyrna Beach Utilities Commission	Timothy Beyrle	Affirmative	
4	Consumers Energy	David Frank Ronk	Affirmative	
4	Detroit Edison Company	Daniel Herring	Affirmative	
4	Florida Municipal Power Agency	Frank Gaffney	Affirmative	
4	Georgia System Operations Corporation	Guy Andrews	Affirmative	
4	Integrus Energy Group, Inc.	Christopher Plante	Abstain	
4	Madison Gas and Electric Co.	Joseph G. DePoorter	Abstain	
4	Ohio Edison Company	Douglas Hohlbaugh	Affirmative	
4	Sacramento Municipal Utility District	Mike Ramirez	Affirmative	
4	Seattle City Light	Hao Li	Affirmative	
4	Seminole Electric Cooperative, Inc.	Steven R Wallace	Affirmative	
4	South Mississippi Electric Power Association	Steve McElhaney	Affirmative	
4	Tacoma Public Utilities	Keith Morissette	Affirmative	
4	Wisconsin Energy Corp.	Anthony Jankowski	Affirmative	
5	AEP Service Corp.	Brock Ondayko	Affirmative	
5	Amerenue	Sam Dwyer	Affirmative	
5	Avista Corp.	Edward F. Groce	Abstain	
5	Black Hills Corp	George Tatar	Affirmative	
5	Bonneville Power Administration	Francis J. Halpin	Affirmative	
5	City of Tallahassee	Alan Gale	Affirmative	
5	Conectiv Energy Supply, Inc.	Kara Dundas	Affirmative	
5	Consolidated Edison Co. of New York	Edwin Thompson		
5	Consumers Energy	James B Lewis	Affirmative	
5	Detroit Edison Company	Ronald W. Bauer		
5	East Kentucky Power Coop.	Stephen Ricker	Affirmative	
5	Entergy Corporation	Stanley M Jaskot	Affirmative	
5	FirstEnergy Solutions	Kenneth Dresner	Affirmative	
5	Florida Municipal Power Agency	David Schumann	Affirmative	
5	Great River Energy	Cynthia E Sulzer	Affirmative	
5	JEA	Donald Gilbert	Abstain	
5	Kansas City Power & Light Co.	Scott Heidtbrink	Affirmative	
5	Kissimmee Utility Authority	Mike Blough		
5	Lakeland Electric	Thomas J Trickey	Affirmative	
5	Lincoln Electric System	Dennis Florom	Affirmative	
5	Louisville Gas and Electric Co.	Charlie Martin	Affirmative	
5	Manitoba Hydro	Mark Aikens	Affirmative	
5	MidAmerican Energy Co.	Christopher Schneider	Negative	
5	New York Power Authority	Gerald Mannarino	Affirmative	
5	Northern Indiana Public Service Co.	Michael K Wilkerson	Affirmative	
5	Orlando Utilities Commission	Richard Kinan	Affirmative	
5	PacifiCorp	Sandra L. Shaffer	Affirmative	
5	Portland General Electric Co.	Gary L Tingley		
5	PPL Generation LLC	Mark A Heimbach	Affirmative	
5	Progress Energy Carolinas	Wayne Lewis	Affirmative	
5	PSEG Power LLC	David Murray	Affirmative	
5	RRI Energy	Thomas J. Bradish	Affirmative	
5	Sacramento Municipal Utility District	Bethany Wright	Affirmative	
5	Salt River Project	Glen Reeves	Affirmative	
5	Seattle City Light	Michael J. Haynes	Affirmative	
5	Seminole Electric Cooperative, Inc.	Brenda K. Atkins	Affirmative	
5	South Carolina Electric & Gas Co.	Richard Jones	Affirmative	
5	Tampa Electric Co.	RJames Rocha		
5	Tenaska, Inc.	Scott M. Helyer	Affirmative	
5	U.S. Army Corps of Engineers Northwestern Division	Karl Bryan	Affirmative	<a href="#">View</a>
5	U.S. Bureau of Reclamation	Martin Bauer P.E.	Abstain	<a href="#">View</a>
5	Wisconsin Electric Power Co.	Linda Horn	Affirmative	
5	Wisconsin Public Service Corp.	Leonard Rentmeester	Affirmative	
5	Xcel Energy, Inc.	Liam Noailles	Affirmative	
6	AEP Marketing	Edward P. Cox	Affirmative	
6	Black Hills Corp	Tyson Taylor		
6	Bonneville Power Administration	Brenda S. Anderson	Affirmative	
6	Consolidated Edison Co. of New York	Nickesha P Carrol	Affirmative	
6	Dominion Resources, Inc.	Louis S Slade	Abstain	
6	Duke Energy Carolina	Walter Yeager	Affirmative	

6	Entergy Services, Inc.	Terri F Benoit	Affirmative
6	FirstEnergy Solutions	Mark S Travaglianti	Affirmative
6	Florida Municipal Power Pool	Thomas E Washburn	Affirmative
6	Florida Power & Light Co.	Silvia P Mitchell	
6	Kansas City Power & Light Co.	Thomas Saitta	
6	Lakeland Electric	Paul Shipps	Affirmative
6	Lincoln Electric System	Eric Ruskamp	Affirmative
6	Louisville Gas and Electric Co.	Daryn Barker	Affirmative
6	Manitoba Hydro	Daniel Prowse	Affirmative
6	New York Power Authority	Thomas Papadopoulos	Affirmative
6	Northern Indiana Public Service Co.	Joseph O'Brien	Affirmative
6	Omaha Public Power District	David Ried	Abstain
6	PacifiCorp	Gregory D Maxfield	Affirmative
6	Progress Energy	James Eckelkamp	Affirmative
6	PSEG Energy Resources & Trade LLC	James D. Hebson	Affirmative
6	RRI Energy	Trent Carlson	Affirmative
6	Santee Cooper	Suzanne Ritter	Affirmative
6	Seattle City Light	Dennis Sismaet	Affirmative
6	Seminole Electric Cooperative, Inc.	Trudy S. Novak	Affirmative
6	South Carolina Electric & Gas Co.	Matt H Bullard	Affirmative
6	Western Area Power Administration - UGP Marketing	John Stonebarger	Affirmative
6	Xcel Energy, Inc.	David F. Lemmons	Affirmative
8		Roger C Zaklukiewicz	Affirmative
8		James A Maenner	Affirmative
8	JDRJC Associates	Jim D. Cyrulewski	Affirmative
8	Power Energy Group LLC	Peggy Abbadini	Affirmative
8	Shafer, Kline, & Warren Inc. (SKW)	Michael J Bequette, P.E.	Affirmative
8	Volkman Consulting, Inc.	Terry Volkman	Affirmative
9	California Energy Commission	William Mitchell Chamberlain	Affirmative
9	Commonwealth of Massachusetts Department of Public Utilities	Donald E. Nelson	Affirmative
10	Electric Reliability Council of Texas, Inc.	Kent Saathoff	Affirmative
10	Florida Reliability Coordinating Council	Linda Campbell	Abstain
10	Midwest Reliability Organization	Dan R. Schoenecker	Affirmative
10	New York State Reliability Council	Alan Adamson	Affirmative
10	Northeast Power Coordinating Council, Inc.	Guy V. Zito	Affirmative
10	ReliabilityFirst Corporation	Jacque Smith	
10	SERC Reliability Corporation	Carter B Edge	
10	Western Electricity Coordinating Council	Louise McCarren	Affirmative

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NORTH AMERICAN ELECTRIC  
RELIABILITY CORPORATION

## Standards Announcement Final Ballot Results for Three Interpretations

Now available at: <https://standards.nerc.net/Ballots.aspx>

Recirculation Ballots for the following interpretations have closed and all three interpretations were approved by their associated ballot pools.

### Project 2008-09 – Interpretation of EOP-001-0 Emergency Operations Planning Requirement R1 for the Regional Entity Compliance Managers

The recirculation ballot for this interpretation ended October 14, 2010. Voting statistics are listed below, and the [Ballot Results](#) Web page provides a link to the detailed results:

Quorum: 88.11%  
Approval: 99.14%

The request and interpretation can be found on the project page:  
[http://www.nerc.com/filez/standards/EOP-001-0\\_ Interpretation\\_RECM.html](http://www.nerc.com/filez/standards/EOP-001-0_ Interpretation_RECM.html)

### Project 2009-28 – Interpretation of EOP-001-1, EOP-001-2 – Emergency Operations Planning for the Florida Municipal Power Pool

The recirculation ballot for this interpretation ended October 15, 2010. Voting statistics are listed below, and the [Ballot Results](#) Web page provides a link to the detailed results:

Quorum: 92.19%  
Approval: 94.78%

The request and interpretation can be found on the project page:  
[http://www.nerc.com/filez/standards/Project2009-28\\_EOP-001-1-2\\_R2.2\\_FMPP.html](http://www.nerc.com/filez/standards/Project2009-28_EOP-001-1-2_R2.2_FMPP.html)

### Project 2009-27 – Interpretation of TOP-002-2a – Normal Operations Planning for the Florida Municipal Power Pool

The recirculation ballot for this interpretation ended October 16, 2010. Voting statistics are listed below, and the [Ballot Results](#) Web page provides a link to the detailed results:

Quorum: 91.21%  
Approval: 93.44%

The request and interpretation can be found on the project page:  
[http://www.nerc.com/filez/standards/Project2009-27\\_TOP-002-2a\\_R10\\_RFI\\_FMPP.html](http://www.nerc.com/filez/standards/Project2009-27_TOP-002-2a_R10_RFI_FMPP.html)





## Next Steps

All three interpretations will be presented to the Board of Trustees for approval.

## Standards Process

The [Standard Processes Manual](#) contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate.

*For more information or assistance, please contact Monica Benson,  
Standards Process Administrator, at [monica.benson@nerc.net](mailto:monica.benson@nerc.net) or at 609.452.8060.*

North American Electric Reliability Corporation  
116-390 Village Blvd.  
Princeton, NJ 08540  
609.452.8060 | [www.nerc.com](http://www.nerc.com)



**Exhibit G**

**Complete Record of Development of the Interpretation of Requirement R3.2 of  
EOP-001-0 — Emergency Operations Planning**

# Project 2009-28

## Interpretation of EOP-001-1 and EOP-001-2 R2.2

### Related Files

**Status:**

Approved by the Board of Trustees on November 4, 2010.

**Purpose/Industry Need:**

Florida Municipal Power Pool (FMPP) is seeking clarification as to whether the BA needs to develop a plan to maintain a load-interchange-generation balance during operating emergencies and follow the directives of the TOP.

In accordance with the Reliability Standards Development Procedure, the interpretation must be posted for a 30-day pre-ballot review, and then balloted. There is no public comment period for an interpretation. Balloting will be conducted following the same method used for balloting standards. If the interpretation is approved by its ballot pool, then the interpretation will be appended to the standard and will become effective when adopted by the NERC Board of Trustees and approved by the applicable regulatory authorities. The interpretation will remain appended to the standard until the standard is revised through the normal standards development process. When the standard is revised, the clarifications provided by the interpretation will be incorporated into the revised standard.

Draft	Action	Dates	Results	Consideration of Comments
FMPP EOP-001-1 and EOP-001-2 Requirement R2.2  Interpretation <a href="#">Clean(9)</a>   <a href="#">Redline(10)</a>  <a href="#">Request for Interpretation(8)</a>	Recirculation Ballot  <a href="#">Vote&gt;&gt;</a>   <a href="#">Info(12)</a>	10/05/10 - 10/15/10 (closed)	<a href="#">Summary(14)</a>  <a href="#">Full Record(13)</a>	
	Pre-ballot Review  <a href="#">Join&gt;&gt;</a>   <a href="#">Info(11)</a>	03/24/10 - 04/23/10 (closed)		
FMPP EOP-001-1 and EOP-001-2 Requirement R2.2  <a href="#">Request for Interpretation(2)</a>  <a href="#">Interpretation(1)</a>	Initial Ballot  <a href="#">Vote&gt;&gt;</a>   <a href="#">Info(4)</a>	02/10/10 - 02/22/10 (closed)	<a href="#">Summary(6)</a>  <a href="#">Full Record(5)</a>	<a href="#">Consideration of Comments(7)</a>
	Pre-ballot Review  <a href="#">Join&gt;&gt;</a>   <a href="#">Info(3)</a>	01/11/10 - 02/10/10 (closed)		
To download a file click on the file using your right mouse button, then save it to your computer in a directory of your choice.				

**Note: an Interpretation cannot be used to change a standard.**

Request for an Interpretation of a Reliability Standard	
Date submitted:	<a href="#">October 15, 2009</a>
Date accepted:	<a href="#">November 30, 2009</a>
<b>Contact information for person requesting the interpretation:</b>	
Name:	<a href="#">Thomas E Washburn</a>
Organization:	<a href="#">Florida Municipal Power Pool</a>
Telephone:	<a href="#">407-384-4066</a>
E-mail:	<a href="mailto:twashburn@ouc.com">twashburn@ouc.com</a>
<b>Identify the standard that needs clarification:</b>	
Standard Number (include version number):	<a href="#">EOP-001-1 and EOP-001-2</a>
Standard Title:	<a href="#">Emergency Operations Planning</a>
<b>Identify specifically what requirement needs clarification:</b>	
<b>Requirement Number and Text of Requirement:</b>	
<a href="#">R2.2. Develop, maintain, and implement a set of plans to mitigate operating emergencies on the transmission system.</a>	
<b>Clarification needed:</b>	
<a href="#">According to the NERC Functional Model, the BA is responsible for maintaining load-generation-interchange balance within the BA Area and supports interconnection frequency in real-time. This is done using frequency control through tie-line bias, regulation service deployment, load-following through economic dispatch, and interchange implementation. The BA is not responsible for plans to mitigate operating emergencies on the transmission system. The BA does follow the directives of the TOP when they are implementing their plans.</a>	
<a href="#">Does the BA need to develop a plan to maintain a load-interchange-generation balance during operating emergencies and follow the directives of the TOP?</a>	
<b>Identify the material impact associated with this interpretation:</b>	
<b>Identify the material impact to your organization or others caused by the lack of clarity or an incorrect interpretation of this standard.</b>	
<a href="#">Not having the correct interpretation of this requirement could cause the BA to be found non-compliant.</a>	

**Project 2009-28: Response to Request for an Interpretation of EOP-001-1 and EOP-001-2, Requirement R2.2, for Florida Municipal Power Pool**

The following interpretation of EOP-001-1 and EOP-001-2 — Emergency Operations Planning, Requirement R2.2, was developed by the Project 2006-03 (System Restoration and Blackstart) drafting team.

**Requirement Number and Text of Requirement**

R2.2. Develop, maintain, and implement a set of plans to mitigate operating emergencies on the transmission system.

**Question**

Does the BA need to develop a plan to maintain a load-interchange-generation balance during operating emergencies and follow the directives of the TOP?

**Response<sup>1</sup>**

The answer to both parts of the question is yes. The Balancing Authority is required by the standard to develop, maintain, and implement a plan. The plan must consider the relationships and agreements with the Transmission Operator for actions directly taken by the Balancing Authority. The Balancing Authority must take actions either as directed by the Transmission Operator or the Reliability Coordinator (reference TOP-001-1, Requirement R3), or as previously agreed to with the Transmission Operator or the Reliability Coordinator to mitigate transmission emergencies. As stated in Requirement R4, the emergency plan shall include the applicable elements in "Attachment 1 –EOP-001-0."

<sup>1</sup> At the time of posting for this response (January 11, 2010), EOP-001-0 is the current Federal Energy Regulatory Commission (FERC)-approved version of the EOP-001 Reliability Standard in the United States and is therefore mandatory and enforceable. EOP-001-1 and EOP-001-2 have been filed with but not yet approved by FERC; therefore, EOP-001-1 and EOP-001-2 are not mandatory and enforceable in the United States at this time. The requirement in question, Requirement R2.2 of EOP-001-1 and EOP-001-2, exists in EOP-001-0 as Requirement R3.2.

**Note: an Interpretation cannot be used to change a standard.**

Request for an Interpretation of a Reliability Standard
Date submitted: <a href="#">October 15, 2009</a>
Date accepted: <a href="#">November 30, 2009</a>
<b>Contact information for person requesting the interpretation:</b>
Name: <a href="#">Thomas E Washburn</a>
Organization: <a href="#">Florida Municipal Power Pool</a>
Telephone: <a href="#">407-384-4066</a>
E-mail: <a href="mailto:twashburn@ouc.com">twashburn@ouc.com</a>
<b>Identify the standard that needs clarification:</b>
Standard Number (include version number): <a href="#">EOP-001-1 and EOP-001-2</a>
Standard Title: <a href="#">Emergency Operations Planning</a>
<b>Identify specifically what requirement needs clarification:</b>
<p><b>Requirement Number and Text of Requirement:</b></p> <p><a href="#">R2.2. Develop, maintain, and implement a set of plans to mitigate operating emergencies on the transmission system.</a></p> <p><b>Clarification needed:</b></p> <p><a href="#">According to the NERC Functional Model, the BA is responsible for maintaining load-generation-interchange balance within the BA Area and supports interconnection frequency in real-time. This is done using frequency control through tie-line bias, regulation service deployment, load-following through economic dispatch, and interchange implementation. The BA is not responsible for plans to mitigate operating emergencies on the transmission system. The BA does follow the directives of the TOP when they are implementing their plans.</a></p> <p><a href="#">Does the BA need to develop a plan to maintain a load-interchange-generation balance during operating emergencies and follow the directives of the TOP?</a></p>
<b>Identify the material impact associated with this interpretation:</b>
<p><b>Identify the material impact to your organization or others caused by the lack of clarity or an incorrect interpretation of this standard.</b></p> <p><a href="#">Not having the correct interpretation of this requirement could cause the BA to be found non-compliant.</a></p>



NORTH AMERICAN ELECTRIC  
RELIABILITY CORPORATION

## Standards Announcement

### Ballot Pool and Pre-ballot Window

January 11–February 10, 2010

Now available at: <https://standards.nerc.net/BallotPool.aspx>

#### **Project 2009-28: Interpretation of EOP-001-1 and EOP-001-2 for the Florida Municipal Power Pool (FMPP)**

An interpretation of standard versions EOP-001-1 and EOP-001-2 — Emergency Operations Planning, Requirement R2.2, for FMPP is posted for a 30-day pre-ballot review. Registered Ballot Body members may join the ballot pool to be eligible to vote on this interpretation **until 8 a.m. EST on February 10, 2010**.

During the pre-ballot window, members of the ballot pool may communicate with one another by using their “ballot pool list server.” (Once the balloting begins, ballot pool members are prohibited from using the ballot pool list servers.) The list server for this ballot pool is: [bp-2009-28\\_RFI\\_FMPP\\_in@nerc.com](mailto:bp-2009-28_RFI_FMPP_in@nerc.com)

#### **Next Steps**

Voting will begin shortly after the pre-ballot review closes.

#### **Project Background**

FMPP is seeking clarification regarding Requirement R2.2. FMPP asked if the Balancing Authority needs to develop a plan to maintain a load-interchange-generation balance during operating emergencies and follow the directives of the Transmission Operator.

The request and interpretation can be found on the project page:

[http://www.nerc.com/filez/standards/Project2009-28\\_EOP-001-1-2\\_R2.2\\_FMPP.html](http://www.nerc.com/filez/standards/Project2009-28_EOP-001-1-2_R2.2_FMPP.html)

#### **Standards Development Process**

The [Reliability Standards Development Procedure](#) contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate.

*For more information or assistance,  
please contact Shaun Streeter at [shaun.streeter@nerc.net](mailto:shaun.streeter@nerc.net) or at 609.452.8060.*



NORTH AMERICAN ELECTRIC  
RELIABILITY CORPORATION

## Standards Announcement

### Initial Ballot Window Open

February 10-22, 2010

Now available at: <https://standards.nerc.net/CurrentBallots.aspx>

#### **Project 2009-28: Interpretation of EOP-001-1 and EOP-001-2 for the Florida Municipal Power Pool (FMPP)**

An initial ballot window for an interpretation of standard versions EOP-001-1 and EOP-001-2 — Emergency Operations Planning, Requirement R2.2, for FMPP is now open **until 8 p.m. EST on February 22, 2010**.

#### **Instructions**

Members of the ballot pool associated with this project may log in and submit their votes from the following page: <https://standards.nerc.net/CurrentBallots.aspx>

#### **Next Steps**

Voting results will be posted and announced after the ballot window closes.

#### **Project Background**

FMPP is seeking clarification regarding Requirement R2.2. FMPP asked if the Balancing Authority needs to develop a plan to maintain a load-interchange-generation balance during operating emergencies and follow the directives of the Transmission Operator.

The request and interpretation can be found on the project page:

[http://www.nerc.com/filez/standards/Project2009-28\\_EOP-001-1-2\\_R2.2\\_FMPP.html](http://www.nerc.com/filez/standards/Project2009-28_EOP-001-1-2_R2.2_FMPP.html)

#### **Standards Development Process**

The [Reliability Standards Development Procedure](#) contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate.

*For more information or assistance,  
please contact Shaun Streeter at [shaun.streeter@nerc.net](mailto:shaun.streeter@nerc.net) or at 609.452.8060.*



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- Proxy Voters

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Ballot Results	
<b>Ballot Name:</b>	Project 2009-28 - Interpretation - EOP-001-1 and EOP-001-2 for FMPP_in
<b>Ballot Period:</b>	2/10/2010 - 2/22/2010
<b>Ballot Type:</b>	Initial
<b>Total # Votes:</b>	235
<b>Total Ballot Pool:</b>	269
<b>Quorum:</b>	<b>87.36 % The Quorum has been reached</b>
<b>Weighted Segment Vote:</b>	91.79 %
<b>Ballot Results:</b>	<b>The standard will proceed to recirculation ballot.</b>

Summary of Ballot Results									
Segment	Ballot Pool	Segment Weight	Affirmative		Negative		Abstain # Votes	No Vote	
			# Votes	Fraction	# Votes	Fraction			
1 - Segment 1.		75	1	58	0.906	6	0.094	3	8
2 - Segment 2.		11	1	9	0.9	1	0.1	0	1
3 - Segment 3.		63	1	53	0.964	2	0.036	2	6
4 - Segment 4.		18	1	14	0.875	2	0.125	0	2
5 - Segment 5.		50	1	38	1	0	0	2	10
6 - Segment 6.		34	1	27	0.964	1	0.036	2	4
7 - Segment 7.		0	0	0	0	0	0	0	0
8 - Segment 8.		6	0.4	4	0.4	0	0	0	2
9 - Segment 9.		4	0.3	2	0.2	1	0.1	1	0
10 - Segment 10.		8	0.5	4	0.4	1	0.1	2	1
<b>Totals</b>		<b>269</b>	<b>7.2</b>	<b>209</b>	<b>6.609</b>	<b>14</b>	<b>0.591</b>	<b>12</b>	<b>34</b>

Individual Ballot Pool Results				
Segment	Organization	Member	Ballot	Comments
1	Allegheny Power	Rodney Phillips	Affirmative	
1	Ameren Services	Kirit S. Shah	Affirmative	
1	American Electric Power	Paul B. Johnson	Affirmative	
1	American Transmission Company, LLC	Jason Shaver	Affirmative	
1	Associated Electric Cooperative, Inc.	John Bussman		
1	Avista Corp.	Scott Kinney	Abstain	
1	Baltimore Gas & Electric Company	John J. Moraski	Affirmative	

1	BC Transmission Corporation	Gordon Rawlings	Affirmative
1	Beaches Energy Services	Joseph S. Stonecipher	Affirmative
1	Black Hills Corp	Eric Egge	Affirmative
1	Bonneville Power Administration	Donald S. Watkins	Affirmative
1	Brazos Electric Power Cooperative, Inc.	Tony Kroskey	
1	CenterPoint Energy	Paul Rocha	Abstain
1	Central Maine Power Company	Brian Conroy	Affirmative
1	City of Vero Beach	Randall McCamish	Affirmative
1	City Utilities of Springfield, Missouri	Jeff Knottek	Affirmative
1	Colorado Springs Utilities	Paul Morland	Affirmative
1	Consolidated Edison Co. of New York	Christopher L de Graffenried	Affirmative
1	Dairyland Power Coop.	Robert W. Roddy	Affirmative
1	Dominion Virginia Power	William L. Thompson	
1	Duke Energy Carolina	Douglas E. Hils	Affirmative
1	E.ON U.S. LLC	Larry Monday	
1	East Kentucky Power Coop.	George S. Carruba	
1	Empire District Electric Co.	Ralph Frederick Meyer	Affirmative
1	Entergy Corporation	George R. Bartlett	Affirmative
1	FirstEnergy Energy Delivery	Robert Martinko	Affirmative
1	Florida Keys Electric Cooperative Assoc.	Dennis Minton	Negative
1	Gainesville Regional Utilities	Luther E. Fair	Affirmative
1	Georgia Transmission Corporation	Harold Taylor, II	Negative
1	Great River Energy	Gordon Pietsch	Affirmative
1	Hydro One Networks, Inc.	Ajay Garg	Affirmative
1	Idaho Power Company	Ronald D. Schellberg	
1	ITC Transmission	Elizabeth Howell	Affirmative
1	JEA	Ted E Hobson	
1	Kansas City Power & Light Co.	Michael Gammon	Affirmative
1	Keys Energy Services	Stan T. Rzad	Affirmative
1	Lakeland Electric	Larry E Watt	Affirmative
1	Lee County Electric Cooperative	John W Delucca	Abstain
1	Lincoln Electric System	Doug Bantam	Affirmative
1	Long Island Power Authority	Jonathan Appelbaum	Affirmative
1	Manitoba Hydro	Michelle Rheault	Affirmative
1	MEAG Power	Danny Dees	Affirmative
1	MidAmerican Energy Co.	Terry Harbour	Affirmative
1	National Grid	Saurabh Saksena	Affirmative
1	New York State Electric & Gas Corp.	Henry G. Masti	Affirmative
1	Northeast Utilities	David H. Boguslawski	Affirmative
1	Northern Indiana Public Service Co.	Kevin M Largura	Affirmative
1	NorthWestern Energy	John Canavan	Affirmative
1	Ohio Valley Electric Corp.	Robert Matthey	Affirmative
1	Oklahoma Gas and Electric Co.	Marvin E VanBebber	Affirmative
1	Orlando Utilities Commission	Brad Chase	Affirmative
1	Otter Tail Power Company	Lawrence R. Larson	Affirmative
1	PacifiCorp	Mark Sampson	Affirmative
1	Potomac Electric Power Co.	Richard J. Kafka	Affirmative
1	PowerSouth Energy Cooperative	Larry D. Avery	Negative
1	PPL Electric Utilities Corp.	Brenda L Truhe	Affirmative
1	Progress Energy Carolinas	Sammy Roberts	Affirmative
1	Public Service Electric and Gas Co.	Kenneth D. Brown	Affirmative
1	Puget Sound Energy, Inc.	Catherine Koch	Affirmative
1	Sacramento Municipal Utility District	Tim Kelley	Affirmative
1	Salt River Project	Robert Kondziolka	Affirmative
1	San Diego Gas & Electric	Linda Brown	Affirmative
1	Santee Cooper	Terry L. Blackwell	Affirmative
1	SCE&G	Henry Delk, Jr.	Negative
1	Seattle City Light	Pawel Krupa	Affirmative
1	Sierra Pacific Power Co.	Richard Salgo	Affirmative
1	Southern California Edison Co.	Dana Cabbell	Affirmative
1	Southern Company Services, Inc.	Horace Stephen Williamson	Affirmative
1	Southwest Transmission Cooperative, Inc.	James L. Jones	Affirmative
1	Southwestern Power Administration	Gary W Cox	
1	Tampa Electric Co.	Thomas J. Szelistowski	Negative
1	Tri-State G & T Association Inc.	Keith V. Carman	Affirmative
1	Westar Energy	Allen Klassen	Negative
1	Western Area Power Administration	Brandy A Dunn	Affirmative

1	Xcel Energy, Inc.	Gregory L Pieper	Affirmative	
2	Alberta Electric System Operator	Jason L. Murray	Affirmative	
2	BC Transmission Corporation	Faramarz Amjadi	Affirmative	
2	Electric Reliability Council of Texas, Inc.	Chuck B Manning	Negative	
2	Florida Municipal Power Pool	Thomas E Washburn	Affirmative	
2	Independent Electricity System Operator	Kim Warren	Affirmative	<a href="#">View</a>
2	ISO New England, Inc.	Kathleen Goodman	Affirmative	
2	Midwest ISO, Inc.	Jason L Marshall	Affirmative	
2	New Brunswick System Operator	Alden Briggs	Affirmative	
2	New York Independent System Operator	Gregory Campoli		
2	PJM Interconnection, L.L.C.	Tom Bowe	Affirmative	
2	Southwest Power Pool	Charles H Yeung	Affirmative	
3	Alabama Power Company	Bobby Kerley	Affirmative	
3	Ameren Services	Mark Peters	Affirmative	
3	American Electric Power	Raj Rana	Affirmative	
3	Atlantic City Electric Company	James V. Petrella	Affirmative	
3	BC Hydro and Power Authority	Pat G. Harrington	Abstain	
3	Black Hills Power	Andy Butcher	Affirmative	
3	Bonneville Power Administration	Rebecca Berdahl	Affirmative	
3	City of Bartow, Florida	Matt Culverhouse	Affirmative	
3	City of Clewiston	Lynne Mila	Affirmative	
3	City of Farmington	Linda R. Jacobson		
3	City of Green Cove Springs	Gregg R Griffin	Affirmative	
3	City Public Service of San Antonio	Edwin Les Barrow		
3	Consolidated Edison Co. of New York	Peter T Yost	Affirmative	
3	Consumers Energy	David A. Lapinski	Affirmative	
3	Cowlitz County PUD	Russell A Noble		
3	Delmarva Power & Light Co.	Michael R. Mayer	Affirmative	
3	Detroit Edison Company	Kent Kujala	Affirmative	
3	Dominion Resources, Inc.	Jalal (John) Babik	Affirmative	
3	Duke Energy Carolina	Henry Ernst-Jr	Affirmative	
3	Entergy Services, Inc.	Matt Wolf	Affirmative	
3	FirstEnergy Solutions	Kevin Querry	Affirmative	<a href="#">View</a>
3	Florida Municipal Power Agency	Joe McKinney	Affirmative	
3	Florida Power & Light Co.	W. R. Schoneck	Abstain	
3	Florida Power Corporation	Lee Schuster	Affirmative	
3	Gainesville Regional Utilities	Kenneth Simmons	Affirmative	
3	Georgia Power Company	Anthony L Wilson	Affirmative	
3	Georgia System Operations Corporation	R Scott S. Barfield-McGinnis	Negative	
3	Grays Harbor PUD	Wesley W Gray	Affirmative	
3	Great River Energy	Sam Kokkinen	Affirmative	
3	Gulf Power Company	Gwen S Frazier	Affirmative	
3	Hydro One Networks, Inc.	Michael D. Penstone	Affirmative	
3	JEA	Garry Baker	Affirmative	
3	Kansas City Power & Light Co.	Charles Locke	Affirmative	
3	Kissimmee Utility Authority	Gregory David Woessner	Affirmative	
3	Lakeland Electric	Mace Hunter	Affirmative	
3	Lincoln Electric System	Bruce Merrill	Affirmative	
3	Louisville Gas and Electric Co.	Charles A. Freibert		
3	Manitoba Hydro	Greg C Parent	Affirmative	
3	MidAmerican Energy Co.	Thomas C. Mielnik	Affirmative	
3	Mississippi Power	Don Horsley	Affirmative	
3	Municipal Electric Authority of Georgia	Steven M. Jackson		
3	New York Power Authority	Marilyn Brown	Affirmative	
3	Niagara Mohawk (National Grid Company)	Michael Schiavone	Affirmative	
3	Northern Indiana Public Service Co.	William SeDoris	Affirmative	
3	Ocala Electric Utility	David T. Anderson	Affirmative	
3	Orlando Utilities Commission	Ballard Keith Muters	Affirmative	
3	PacifiCorp	John Apperson	Affirmative	
3	Platte River Power Authority	Terry L Baker	Affirmative	
3	Potomac Electric Power Co.	Robert Reuter	Affirmative	
3	Progress Energy Carolinas	Sam Waters	Affirmative	
3	Public Service Electric and Gas Co.	Jeffrey Mueller	Affirmative	
3	Public Utility District No. 2 of Grant County	Greg Lange	Affirmative	
3	Sacramento Municipal Utility District	James Leigh-Kendall	Affirmative	
3	Salt River Project	John T. Underhill	Affirmative	
3	San Diego Gas & Electric	Scott Peterson		

3	Santee Cooper	Zack Dusenbury	Affirmative	
3	Seattle City Light	Dana Wheelock	Affirmative	
3	South Carolina Electric & Gas Co.	Hubert C. Young	Affirmative	
3	Southern California Edison Co.	David Schiada	Affirmative	
3	Tampa Electric Co.	Ronald L. Donahey	Negative	
3	Wisconsin Electric Power Marketing	James R. Keller	Affirmative	
3	Wisconsin Public Service Corp.	Gregory J. Le Grave	Affirmative	
3	Xcel Energy, Inc.	Michael Ibold	Affirmative	
4	Alliant Energy Corp. Services, Inc.	Kenneth Goldsmith	Affirmative	
4	City of Clewiston	Kevin McCarthy	Affirmative	
4	City of New Smyrna Beach Utilities Commission	Timothy Beyrle	Affirmative	
4	Consumers Energy	David Frank Ronk	Affirmative	
4	Detroit Edison Company	Daniel Herring	Affirmative	
4	Florida Municipal Power Agency	Frank Gaffney	Affirmative	
4	Fort Pierce Utilities Authority	Thomas W. Richards	Affirmative	
4	Georgia System Operations Corporation	Guy Andrews	Negative	
4	Integrus Energy Group, Inc.	Christopher Plante	Affirmative	
4	Madison Gas and Electric Co.	Joseph G. DePoorter	Affirmative	
4	Northern California Power Agency	Fred E. Young	Affirmative	
4	Ohio Edison Company	Douglas Hohlbaugh	Affirmative	
4	Old Dominion Electric Coop.	Mark Ringhausen		
4	Public Utility District No. 1 of Douglas County	Henry E. LuBean	Affirmative	
4	Sacramento Municipal Utility District	Mike Ramirez	Affirmative	
4	Seattle City Light	Hao Li	Affirmative	
4	Seminole Electric Cooperative, Inc.	Steven R. Wallace		
4	Wisconsin Energy Corp.	Anthony Jankowski	Negative	<a href="#">View</a>
5	AEP Service Corp.	Brock Ondayko	Affirmative	
5	Amerenue	Sam Dwyer		
5	Avista Corp.	Edward F. Groce	Abstain	
5	Bonneville Power Administration	Francis J. Halpin	Affirmative	
5	City of Tallahassee	Alan Gale	Affirmative	
5	City Water, Light & Power of Springfield	Karl E. Kohlrus	Affirmative	
5	Colmac Clarion/Piney Creek LP	Harvie D. Beavers	Affirmative	
5	Consolidated Edison Co. of New York	Edwin E. Thompson	Affirmative	
5	Consumers Energy	James B. Lewis	Affirmative	
5	Dairyland Power Coop.	Warren Schaefer	Affirmative	
5	Detroit Edison Company	Ronald W. Bauer	Affirmative	
5	Dominion Resources, Inc.	Mike Garton	Affirmative	
5	Duke Energy	Robert Smith	Affirmative	
5	Entergy Corporation	Stanley M. Jaskot	Affirmative	
5	FirstEnergy Solutions	Kenneth Dresner	Affirmative	
5	Florida Municipal Power Agency	David Schumann	Affirmative	
5	FPL Energy	Benjamin Church		
5	Great River Energy	Cynthia E. Sulzer	Affirmative	
5	JEA	Donald Gilbert	Affirmative	
5	Kansas City Power & Light Co.	Scott Heidtbrink	Affirmative	
5	Kissimmee Utility Authority	Mike Blough	Affirmative	
5	Lakeland Electric	Thomas J. Trickey	Affirmative	
5	Lincoln Electric System	Dennis Florom	Affirmative	
5	Louisville Gas and Electric Co.	Charlie Martin		
5	Manitoba Hydro	Mark Aikens	Affirmative	
5	MidAmerican Energy Co.	Christopher Schneider	Affirmative	
5	New York Power Authority	Gerald Mannarino		
5	Northern Indiana Public Service Co.	Michael K. Wilkerson	Affirmative	
5	Northern States Power Co.	Liam Noailles	Affirmative	
5	Orlando Utilities Commission	Richard Kinan		
5	PacifiCorp	Sandra L. Shaffer	Affirmative	
5	Portland General Electric Co.	Gary L. Tingley		
5	PowerSouth Energy Cooperative	Tim Hattaway	Affirmative	
5	PPL Generation LLC	Mark A. Heimbach	Affirmative	
5	Progress Energy Carolinas	Wayne Lewis	Affirmative	
5	PSEG Power LLC	David Murray	Affirmative	
5	Reedy Creek Energy Services	Bernie Budnik		
5	RRI Energy	Thomas J. Bradish	Affirmative	
5	Sacramento Municipal Utility District	Bethany Wright	Affirmative	
5	Salt River Project	Glen Reeves	Affirmative	

5	Seattle City Light	Michael J. Haynes	Affirmative	
5	Seminole Electric Cooperative, Inc.	Brenda K. Atkins		
5	South California Edison Company	Ahmad Sanati		
5	South Carolina Electric & Gas Co.	Richard Jones	Affirmative	
5	South Mississippi Electric Power Association	Jerry W Johnson		
5	Tenaska, Inc.	Scott M. Helyer	Abstain	
5	U.S. Army Corps of Engineers Northwestern Division	Karl Bryan	Affirmative	
5	U.S. Bureau of Reclamation	Martin Bauer P.E.	Affirmative	
5	Wisconsin Electric Power Co.	Linda Horn	Affirmative	
5	Wisconsin Public Service Corp.	Leonard Rentmeester	Affirmative	
6	AEP Marketing	Edward P. Cox	Affirmative	
6	Ameren Energy Marketing Co.	Jennifer Richardson		
6	Black Hills Corp	Tyson Taylor		
6	Bonneville Power Administration	Brenda S. Anderson	Affirmative	
6	Consolidated Edison Co. of New York	Nickesha P Carrol	Affirmative	
6	Constellation Energy Commodities Group	Chris Lyons	Affirmative	
6	Dominion Resources, Inc.	Louis S Slade	Affirmative	
6	Duke Energy Carolina	Walter Yeager	Affirmative	
6	Entergy Services, Inc.	Terri F Benoit	Affirmative	
6	Eugene Water & Electric Board	Daniel Mark Bedbury	Affirmative	
6	FirstEnergy Solutions	Mark S Travaglianti	Affirmative	
6	Florida Municipal Power Agency	Richard L. Montgomery	Affirmative	
6	Florida Power & Light Co.	Silvia P Mitchell		
6	Great River Energy	Donna Stephenson	Affirmative	
6	Kansas City Power & Light Co.	Thomas Saitta	Affirmative	
6	Lakeland Electric	Paul Shipps	Affirmative	
6	Lincoln Electric System	Eric Ruskamp	Affirmative	
6	Louisville Gas and Electric Co.	Daryn Barker	Negative	
6	Manitoba Hydro	Daniel Prowse	Affirmative	
6	New York Power Authority	Thomas Papadopoulos	Affirmative	
6	Northern Indiana Public Service Co.	Joseph O'Brien	Affirmative	
6	Omaha Public Power District	David Ried	Abstain	
6	PacifiCorp	Gregory D Maxfield	Affirmative	
6	Progress Energy	James Eckelkamp	Affirmative	
6	PSEG Energy Resources & Trade LLC	James D. Hebson	Affirmative	
6	Public Utility District No. 1 of Chelan County	Hugh A. Owen	Affirmative	
6	RRI Energy	Trent Carlson	Affirmative	
6	Salt River Project	Mike Hummel	Affirmative	
6	Santee Cooper	Suzanne Ritter	Affirmative	
6	Seattle City Light	Dennis Sismaet	Abstain	
6	Seminole Electric Cooperative, Inc.	Trudy S. Novak		
6	Southern California Edison Co.	Marcus V Lotto	Affirmative	
6	Western Area Power Administration - UGP Marketing	John Stonebarger	Affirmative	
6	Xcel Energy, Inc.	David F. Lemmons	Affirmative	
8	Edward C Stein	Edward C Stein		
8	James A Maenner	James A Maenner	Affirmative	
8	JDRJC Associates	Jim D. Cyrulewski	Affirmative	
8	Power Energy Group LLC	Peggy Abbadini		
8	Roger C Zaklukiewicz	Roger C Zaklukiewicz	Affirmative	
8	Volkman Consulting, Inc.	Terry Volkman	Affirmative	
9	California Energy Commission	William Mitchell Chamberlain	Affirmative	
9	Commonwealth of Massachusetts Department of Public Utilities	Donald E. Nelson	Affirmative	
9	Maine Public Utilities Commission	Jacob A McDermott	Abstain	
9	Utah Associated Municipal Power Systems	Tom Florence	Negative	
10	Electric Reliability Council of Texas, Inc.	Kent Saathoff	Negative	<a href="#">View</a>
10	Florida Reliability Coordinating Council	Linda Campbell	Abstain	
10	Midwest Reliability Organization	Dan R. Schoenecker	Affirmative	
10	New York State Reliability Council	Alan Adamson	Affirmative	
10	Northeast Power Coordinating Council, Inc.	Guy V. Zito	Affirmative	
10	ReliabilityFirst Corporation	Jacque Smith		
10	SERC Reliability Corporation	Carter B Edge	Abstain	
10	Western Electricity Coordinating Council	Louise McCarren	Affirmative	



[Legal and Privacy](#) : 609.452.8060 voice : 609.452.9550 fax : 116-390 Village Boulevard : Princeton, NJ 08540-5721  
Washington Office: 1120 G Street, N.W. : Suite 990 : Washington, DC 20005-3801

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NORTH AMERICAN ELECTRIC  
RELIABILITY CORPORATION

## Standards Announcement

### Initial Ballot Results

Now available at: <https://standards.nerc.net/Ballots.aspx>

#### **Project 2009-28: Interpretation of EOP-001-1 and EOP-001-2 for the Florida Municipal Power Pool (FMPP)**

The initial ballot for an interpretation of standard versions EOP-001-1 and EOP-001-2 — Emergency Operations Planning, Requirement R2.2, for FMPP ended on February 22, 2010.

#### **Ballot Results**

Voting statistics are listed below, and the [Ballot Results](#) Web page provides a link to the detailed results:

Quorum: 87.36%

Approval: 91.79%

Since at least one negative ballot included a comment, these results are not final. A second (or recirculation) ballot must be conducted. Ballot criteria are listed at the end of the announcement.

#### **Next Steps**

As part of the recirculation ballot process, the drafting team must draft and post responses to voter comments. The drafting team will also determine whether or not to make revisions to the balloted item(s). Should the team decide to make revisions, the revised item(s) will return to the initial ballot phase.

#### **Project Background**

FMPP is seeking clarification regarding Requirement R2.2. FMPP asked if the Balancing Authority needs to develop a plan to maintain a load-interchange-generation balance during operating emergencies and follow the directives of the Transmission Operator.

The request and interpretation can be found on the project page:

[http://www.nerc.com/filez/standards/Project2009-28\\_EOP-001-1-2\\_R2.2\\_FMPP.html](http://www.nerc.com/filez/standards/Project2009-28_EOP-001-1-2_R2.2_FMPP.html)

#### **Standards Development Process**

The [Reliability Standards Development Procedure](#) contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate.

#### **Ballot Criteria**

Approval requires both a (1) quorum, which is established by at least 75% of the members of the ballot pool for submitting either an affirmative vote, a negative vote, or an abstention, and (2) A two-thirds majority of the weighted segment votes cast must be affirmative; the number of votes cast is the sum of affirmative and negative votes, excluding abstentions and nonresponses. If there are no negative votes with reasons from the first ballot, the results of the first ballot shall stand. If, however, one or more members submit negative votes with reasons, a second ballot shall be conducted.

*For more information or assistance,  
please contact Shaun Streeter at [shaun.streeter@nerc.net](mailto:shaun.streeter@nerc.net) or at 609.452.8060.*

**Project 2009-28: Interpretation of EOP-001-1 and EOP-001-2 for the Florida Municipal Power Pool  
Consideration of Comments for Initial Ballot (February 10–22, 2010)**

**Summary Consideration:**

Balloters who submitted negative votes with reasons were concerned about a possible expansion of the Balancing Authority requirements as a result of the interpretation. The balloters pointed out that, according to the standard as written, there is no requirement for agreements or for the Balancing Authority to follow Transmission Operator directives.

The drafting team recognizes it went outside the bounds of EOP-001-1 and EOP-001-2 in the effort to provide additional clarification in the interpretation. Accordingly, the drafting team is replacing the word “agreements” in the third sentence with “coordination.”

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, Gerry Adamski, at 609-452-8060 or at gerry.adamski@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.<sup>1</sup>

Voter	Entity	Segment	Vote	Comment
Kevin Query	FirstEnergy Solutions	3	Affirmative	No Comment
Anthony Jankowski	Wisconsin Energy Corp.	4	Negative	The answer does not provide a clear understanding of the standard. The third sentence of the answer adds a requirement that the BA plan include consideration for relationships and agreements, there is no requirement to have agreements. The second part of sentence four "or as previously agreed to with the Transmission Operator or the Reliability Coordinator to mitigate transmission emergencies" is not a standard requirement, thereby expanding the scope of the standard.
<p><b>Response:</b> The drafting team thanks you for your comments and is replacing the word “agreements” in the third sentence with “coordination.” The drafting team recognizes it went outside the bounds of EOP-001-1 and EOP-001-2 in the effort to provide additional clarification in the interpretation.</p>				
Kim Warren	Independent Electricity System Operator	2	Affirmative	The IESO is concerned that in recent months, there have been an increasing number of simplistic interpretations being put in front of the entire balloting body. In our view, some of the inquiries could have been addressed via other avenues than the formal interpretation process. We suggest that NERC expeditiously develop an alternative approach, similar to the Information Request Program established by the FRCC, to field industry questions before they rise up to the

<sup>1</sup> The appeals process is in the Reliability Standards Development Procedure: [http://www.nerc.com/files/RSDP\\_V6\\_1\\_12Mar07.pdf](http://www.nerc.com/files/RSDP_V6_1_12Mar07.pdf).



Voter	Entity	Segment	Vote	Comment
				formal interpretation request level. Industry participants should be encouraged to use other available resources and avenues instead of or before proceeding to a formal interpretation process to obtain understanding of standard applicability and compliance.
<b>Response:</b> The drafting team thanks you for your comment.				
Kent Saathoff	Electric Reliability Council of Texas, Inc.	10	Negative	The requirement in R2.2 is that BAs and TOPs develop, maintain, and implement a set of plans to mitigate operating emergencies on the transmission system. The interpretation states that the BA must have a plan and must take actions as directed by the TOP or the RC. The plain language of the requirement states that the BA must have a plan to mitigate operating emergencies. However, neither this particular requirement, nor any other part of the Standard (including the list of plan elements in Attachment 1-EOP-001-0 to the Standard) requires the BA to follow the directives of the TOP. That obligation is not a requirement under this Standard.
<b>Response:</b> The drafting team recognizes it went outside the bounds of EOP-001-1 and EOP-001-2 in the effort to provide additional clarification in the interpretation. The drafting team is replacing the word “agreements” in the third sentence with “coordination.”				

**Note: an Interpretation cannot be used to change a standard.**

Request for an Interpretation of a Reliability Standard
Date submitted: <a href="#">October 15, 2009</a>
Date accepted: <a href="#">November 30, 2009</a>
<b>Contact information for person requesting the interpretation:</b>
Name: <a href="#">Thomas E Washburn</a>
Organization: <a href="#">Florida Municipal Power Pool</a>
Telephone: <a href="#">407-384-4066</a>
E-mail: <a href="mailto:twashburn@ouc.com">twashburn@ouc.com</a>
<b>Identify the standard that needs clarification:</b>
Standard Number (include version number): <a href="#">EOP-001-1 and EOP-001-2</a>
Standard Title: <a href="#">Emergency Operations Planning</a>
<b>Identify specifically what requirement needs clarification:</b>
<p><b>Requirement Number and Text of Requirement:</b></p> <p><a href="#">R2.2. Develop, maintain, and implement a set of plans to mitigate operating emergencies on the transmission system.</a></p> <p><b>Clarification needed:</b></p> <p><a href="#">According to the NERC Functional Model, the BA is responsible for maintaining load-generation-interchange balance within the BA Area and supports interconnection frequency in real-time. This is done using frequency control through tie-line bias, regulation service deployment, load-following through economic dispatch, and interchange implementation. The BA is not responsible for plans to mitigate operating emergencies on the transmission system. The BA does follow the directives of the TOP when they are implementing their plans.</a></p> <p><a href="#">Does the BA need to develop a plan to maintain a load-interchange-generation balance during operating emergencies and follow the directives of the TOP?</a></p>
<b>Identify the material impact associated with this interpretation:</b>
<p><b>Identify the material impact to your organization or others caused by the lack of clarity or an incorrect interpretation of this standard.</b></p> <p><a href="#">Not having the correct interpretation of this requirement could cause the BA to be found non-compliant.</a></p>

**Note: an Interpretation cannot be used to change a standard.**

Request for an Interpretation of a Reliability Standard
Date submitted: <a href="#">October 15, 2009</a>
Date accepted: <a href="#">November 30, 2009</a>
<b>Contact information for person requesting the interpretation:</b>
Name: <a href="#">Thomas E Washburn</a>
Organization: <a href="#">Florida Municipal Power Pool</a>
Telephone: <a href="#">407-384-4066</a>
E-mail: <a href="mailto:twashburn@ouc.com">twashburn@ouc.com</a>
<b>Identify the standard that needs clarification:</b>
Standard Number (include version number): <a href="#">EOP-001-1 and EOP-001-2</a>
Standard Title: <a href="#">Emergency Operations Planning</a>
<b>Identify specifically what requirement needs clarification:</b>
<b>Requirement Number and Text of Requirement:</b> <a href="#">R2.2. Develop, maintain, and implement a set of plans to mitigate operating emergencies on the transmission system.</a>
<b>Clarification needed:</b> <a href="#">According to the NERC Functional Model, the BA is responsible for maintaining load-generation-interchange balance within the BA Area and supports interconnection frequency in real-time. This is done using frequency control through tie-line bias, regulation service deployment, load-following through economic dispatch, and interchange implementation. The BA is not responsible for plans to mitigate operating emergencies on the transmission system. The BA does follow the directives of the TOP when they are implementing their plans.</a>  <a href="#">Does the BA need to develop a plan to maintain a load-interchange-generation balance during operating emergencies and follow the directives of the TOP?</a>
<b>Identify the material impact associated with this interpretation:</b>
<b>Identify the material impact to your organization or others caused by the lack of clarity or an incorrect interpretation of this standard.</b> <a href="#">Not having the correct interpretation of this requirement could cause the BA to be found non-compliant.</a>

**Project 2009-28: Response to Request for an Interpretation of EOP-001-1 and EOP-001-2, Requirement R2.2, for Florida Municipal Power Pool**

The following interpretation of EOP-001-1 and EOP-001-2 — Emergency Operations Planning, Requirement R2.2, was developed by the Project 2006-03 (System Restoration and Blackstart) drafting team.

**Requirement Number and Text of Requirement**

R2.2. Develop, maintain, and implement a set of plans to mitigate operating emergencies on the transmission system.

**Question**

Does the BA need to develop a plan to maintain a load-interchange-generation balance during operating emergencies and follow the directives of the TOP?

**Response<sup>1</sup>**

The answer to both parts of the question is yes. The Balancing Authority is required by the standard to develop, maintain, and implement a plan. The plan must consider the relationships and coordination with the Transmission Operator for actions directly taken by the Balancing Authority. The Balancing Authority must take actions either as directed by the Transmission Operator or the Reliability Coordinator (reference TOP-001-1, Requirement R3), or as previously agreed to with the Transmission Operator or the Reliability Coordinator to mitigate transmission emergencies. As stated in Requirement R4, the emergency plan shall include the applicable elements in "Attachment 1 –EOP-001-0."

<sup>1</sup> At the time of posting for this response (January 11, 2010), EOP-001-0 is the current Federal Energy Regulatory Commission (FERC)-approved version of the EOP-001 Reliability Standard in the United States and is therefore mandatory and enforceable. EOP-001-1 and EOP-001-2 have been filed with but not yet approved by FERC; therefore, EOP-001-1 and EOP-001-2 are not mandatory and enforceable in the United States at this time. The requirement in question, Requirement R2.2 of EOP-001-1 and EOP-001-2, exists in EOP-001-0 as Requirement R3.2.

**Note: an Interpretation cannot be used to change a standard.**

Request for an Interpretation of a Reliability Standard
Date submitted: <a href="#">October 15, 2009</a>
Date accepted: <a href="#">November 30, 2009</a>
<b>Contact information for person requesting the interpretation:</b>
Name: <a href="#">Thomas E Washburn</a>
Organization: <a href="#">Florida Municipal Power Pool</a>
Telephone: <a href="#">407-384-4066</a>
E-mail: <a href="mailto:twashburn@ouc.com">twashburn@ouc.com</a>
<b>Identify the standard that needs clarification:</b>
Standard Number (include version number): <a href="#">EOP-001-1 and EOP-001-2</a>
Standard Title: <a href="#">Emergency Operations Planning</a>
<b>Identify specifically what requirement needs clarification:</b>
<p><b>Requirement Number and Text of Requirement:</b></p> <p><a href="#">R2.2. Develop, maintain, and implement a set of plans to mitigate operating emergencies on the transmission system.</a></p> <p><b>Clarification needed:</b></p> <p><a href="#">According to the NERC Functional Model, the BA is responsible for maintaining load-generation-interchange balance within the BA Area and supports interconnection frequency in real-time. This is done using frequency control through tie-line bias, regulation service deployment, load-following through economic dispatch, and interchange implementation. The BA is not responsible for plans to mitigate operating emergencies on the transmission system. The BA does follow the directives of the TOP when they are implementing their plans.</a></p> <p><a href="#">Does the BA need to develop a plan to maintain a load-interchange-generation balance during operating emergencies and follow the directives of the TOP?</a></p>
<b>Identify the material impact associated with this interpretation:</b>
<p><b>Identify the material impact to your organization or others caused by the lack of clarity or an incorrect interpretation of this standard.</b></p> <p><a href="#">Not having the correct interpretation of this requirement could cause the BA to be found non-compliant.</a></p>

**Project 2009-28: Response to Request for an Interpretation of EOP-001-1 and EOP-001-2, Requirement R2.2, for Florida Municipal Power Pool**

The following interpretation of EOP-001-1 and EOP-001-2 — Emergency Operations Planning, Requirement R2.2, was developed by the Project 2006-03 (System Restoration and Blackstart) drafting team.

**Requirement Number and Text of Requirement**

R2.2. Develop, maintain, and implement a set of plans to mitigate operating emergencies on the transmission system.

**Question**

Does the BA need to develop a plan to maintain a load-interchange-generation balance during operating emergencies and follow the directives of the TOP?

**Response<sup>1</sup>**

The answer to both parts of the question is yes. The Balancing Authority is required by the standard to develop, maintain, and implement a plan. The plan must consider the relationships and **agreements** coordination with the Transmission Operator for actions directly taken by the Balancing Authority. The Balancing Authority must take actions either as directed by the Transmission Operator or the Reliability Coordinator (reference TOP-001-1, Requirement R3), or as previously agreed to with the Transmission Operator or the Reliability Coordinator to mitigate transmission emergencies. As stated in Requirement R4, the emergency plan shall include the applicable elements in "Attachment 1 –EOP-001-0."

<sup>1</sup> At the time of posting for this response (January 11, 2010), EOP-001-0 is the current Federal Energy Regulatory Commission (FERC)-approved version of the EOP-001 Reliability Standard in the United States and is therefore mandatory and enforceable. EOP-001-1 and EOP-001-2 have been filed with but not yet approved by FERC; therefore, EOP-001-1 and EOP-001-2 are not mandatory and enforceable in the United States at this time. The requirement in question, Requirement R2.2 of EOP-001-1 and EOP-001-2, exists in EOP-001-0 as Requirement R3.2.



NORTH AMERICAN ELECTRIC  
RELIABILITY CORPORATION

## Standards Announcement

### Ballot Pool and Pre-ballot Window

March 24–April 23, 2010

Now available at: <https://standards.nerc.net/BallotPool.aspx>

#### **Project 2009-28: Interpretation of EOP-001-1 and EOP-001-2 for Florida Municipal Power Pool (FMPP)**

A revised interpretation of standard versions EOP-001-1 and EOP-001-2 — Emergency Operations Planning, Requirement R2.2, for FMPP is posted for a 30-day pre-ballot review **until 8 a.m. Eastern on April 23, 2010.**

#### **Instructions**

Registered Ballot Body members may join the ballot pool to be eligible to vote in the upcoming ballot at the following page: <https://standards.nerc.net/BallotPool.aspx>.

During the pre-ballot window, members of the ballot pool may communicate with one another by using their “ballot pool list server.” (Once the balloting begins, ballot pool members are prohibited from using the ballot pool list servers.) The list server for this ballot pool is: [bp-2009-28\\_RFI\\_FMPP\\_Rev\\_in@nerc.com](mailto:bp-2009-28_RFI_FMPP_Rev_in@nerc.com).

#### **Next Steps**

Voting will begin shortly after the pre-ballot review closes.

#### **Project Background**

FMPP is seeking clarification regarding Requirement R2.2. FMPP asked if the Balancing Authority needs to develop a plan to maintain a load-interchange-generation balance during operating emergencies and follow the directives of the Transmission Operator.

This is a revised version of the interpretation. The drafting team revised the interpretation to address balloter concerns about a possible expansion of the Balancing Authority requirements resulting from the original interpretation.

The changes to the interpretation are shown in a redline version posted on the project page. The team has also posted a response to comments received during the initial ballot (conducted in February 2010) of the original interpretation.

The request and interpretation can be found on the project page:

[http://www.nerc.com/filez/standards/Project2009-28\\_EOP-001-1-2\\_R2.2\\_FMPP.html](http://www.nerc.com/filez/standards/Project2009-28_EOP-001-1-2_R2.2_FMPP.html)

#### **Standards Development Process**

The [Reliability Standards Development Procedure](#) contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate.

*For more information or assistance,  
please contact Lauren Koller at [Lauren.Koller@nerc.net](mailto:Lauren.Koller@nerc.net)*

## Standards Announcement Recirculation Ballot Window Open October 5–15, 2010

Now available at: <https://standards.nerc.net/CurrentBallots.aspx>

### **Interpretation of EOP-001-1, EOP-001-2 – Emergency Operations Planning for the Florida Municipal Power Pool (Project 2009-28)**

A recirculation ballot window for an interpretation of EOP-001-1 and EOP-001-2 — Emergency Operations Planning, Requirement R2.2 for Florida Municipal Power Pool (FMPP) is now open **until 8 p.m. EDT on October 15, 2010**.

### **Project Background**

FMPP is seeking clarification regarding Requirement R2.2. FMPP asked if the Balancing Authority needs to develop a plan to maintain a load-interchange-generation balance during operating emergencies and follow the directives of the Transmission Operator.

The request and interpretation can be found on the project page:

[http://www.nerc.com/filez/standards/Project2009-28\\_EOP-001-1-2\\_R2.2\\_FMPP.html](http://www.nerc.com/filez/standards/Project2009-28_EOP-001-1-2_R2.2_FMPP.html)

### **Recirculation Ballot Process**

The Standards Committee encourages all members of the Ballot Pool to review the consideration of comments submitted with the initial ballots. In the recirculation ballot, votes are counted by exception only. If a Ballot Pool member does not submit a revision to that member's original vote, the vote remains the same as in the first ballot. Members of the ballot pool may:

- Reconsider and change their vote from the first ballot
- Vote in the second ballot even if they did not vote on the first ballot
- Take no action if they do not want to change their original vote

### **Transition from Reliability Standards Development Procedure Version 7 to Standard Processes Manual**

Under the Reliability Standards Development Procedure Version 7, interpretations did not have any comment period and were posted for ballot once they were drafted. Under the Standard Processes Manual each interpretation is posted for a 30-day formal comment period; then the drafting team responds to comments; then the interpretation (revised if needed) is posted for a 45-day formal comment period conducted in parallel with an initial ballot. If there are no significant changes to the interpretation and the initial ballot sufficient affirmative votes for approval, then the interpretation proceeds to a recirculation ballot.

The addition of a comment period before the pre-ballot review period and the addition of a comment period in parallel with the initial ballot, are steps that were added to the process based on stakeholder comments



indicating that interpretations needed more stakeholder input before being finalized.

This interpretation had already been through an initial ballot when the Standard Processes Manual was approved, and no changes were made to the interpretation following the initial ballot; thus, this interpretation is moving forward for a recirculation ballot.

### **Next Steps**

Voting results will be posted and announced after the recirculation ballot window closes.

### **Standards Process**

The [Standard Processes Manual](#) contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate.

*For more information or assistance, please contact Monica Benson,  
Standards Process Administrator, at [monica.benson@nerc.net](mailto:monica.benson@nerc.net) or at 609.452.8060.*

North American Electric Reliability Corporation  
116-390 Village Blvd.  
Princeton, NJ 08540  
609.452.8060 | [www.nerc.com](http://www.nerc.com)



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**Ballot Results**

<b>Ballot Name:</b>	Project 2009-28 - Interpretation - EOP-001-1 and EOP-001-2 for FMPP_rc
<b>Ballot Period:</b>	10/5/2010 - 10/15/2010
<b>Ballot Type:</b>	recirculation
<b>Total # Votes:</b>	248
<b>Total Ballot Pool:</b>	269
<b>Quorum:</b>	<b>92.19 % The Quorum has been reached</b>
<b>Weighted Segment Vote:</b>	94.78 %
<b>Ballot Results:</b>	<b>The Standard has Passed</b>

**Summary of Ballot Results**

Segment	Ballot Pool	Segment Weight	Affirmative		Negative		Abstain # Votes	No Vote	
			# Votes	Fraction	# Votes	Fraction			
1 - Segment 1.		75	1	61	0.968	2	0.032	7	5
2 - Segment 2.		11	1	9	0.9	1	0.1	0	1
3 - Segment 3.		63	1	54	0.982	1	0.018	5	3
4 - Segment 4.		18	1	15	1	0	0	2	1
5 - Segment 5.		50	1	37	0.974	1	0.026	6	6
6 - Segment 6.		34	1	28	1	0	0	3	3
7 - Segment 7.		0	0	0	0	0	0	0	0
8 - Segment 8.		6	0.4	4	0.4	0	0	1	1
9 - Segment 9.		4	0.3	2	0.2	1	0.1	1	0
10 - Segment 10.		8	0.5	4	0.4	1	0.1	2	1
<b>Totals</b>		<b>269</b>	<b>7.2</b>	<b>214</b>	<b>6.824</b>	<b>7</b>	<b>0.376</b>	<b>27</b>	<b>21</b>

**Individual Ballot Pool Results**

Segment	Organization	Member	Ballot	Comments
1	Allegheny Power	Rodney Phillips	Affirmative	
1	Ameren Services	Kirit S. Shah	Affirmative	
1	American Electric Power	Paul B. Johnson	Affirmative	
1	American Transmission Company, LLC	Jason Shaver	Affirmative	
1	Associated Electric Cooperative, Inc.	John Bussman		
1	Avista Corp.	Scott Kinney	Abstain	
1	Baltimore Gas & Electric Company	John J. Moraski	Affirmative	

1	BC Transmission Corporation	Gordon Rawlings	Affirmative
1	Beaches Energy Services	Joseph S. Stonecipher	Affirmative
1	Black Hills Corp	Eric Egge	Affirmative
1	Bonneville Power Administration	Donald S. Watkins	Affirmative
1	Brazos Electric Power Cooperative, Inc.	Tony Kroskey	
1	CenterPoint Energy	Paul Rocha	Abstain
1	Central Maine Power Company	Brian Conroy	Affirmative
1	City of Vero Beach	Randall McCamish	Affirmative
1	City Utilities of Springfield, Missouri	Jeff Knottek	Affirmative
1	Colorado Springs Utilities	Paul Morland	Affirmative
1	Consolidated Edison Co. of New York	Christopher L de Graffenried	Affirmative
1	Dairyland Power Coop.	Robert W. Roddy	Affirmative
1	Dominion Virginia Power	William L. Thompson	
1	Duke Energy Carolina	Douglas E. Hils	Affirmative
1	E.ON U.S.	Larry Monday	Abstain
1	East Kentucky Power Coop.	George S. Carruba	Affirmative
1	Empire District Electric Co.	Ralph Frederick Meyer	Affirmative
1	Entergy Corporation	George R. Bartlett	Affirmative
1	FirstEnergy Energy Delivery	Robert Martinko	Affirmative
1	Florida Keys Electric Cooperative Assoc.	Dennis Minton	Affirmative
1	Gainesville Regional Utilities	Luther E. Fair	Affirmative
1	Georgia Transmission Corporation	Harold Taylor, II	Abstain
1	Great River Energy	Gordon Pietsch	Affirmative
1	Hydro One Networks, Inc.	Ajay Garg	Affirmative
1	Idaho Power Company	Ronald D. Schellberg	
1	ITC Transmission	Elizabeth Howell	Affirmative
1	JEA	Ted E Hobson	
1	Kansas City Power & Light Co.	Michael Gammon	Affirmative
1	Keys Energy Services	Stan T. Rzad	Affirmative
1	Lakeland Electric	Larry E Watt	Affirmative
1	Lee County Electric Cooperative	John W Delucca	Abstain
1	Lincoln Electric System	Doug Bantam	Affirmative
1	Long Island Power Authority	Jonathan Appelbaum	Affirmative
1	Manitoba Hydro	Michelle Rheault	Affirmative
1	MEAG Power	Danny Dees	Affirmative
1	MidAmerican Energy Co.	Terry Harbour	Affirmative
1	National Grid	Saurabh Saksena	Affirmative
1	New York State Electric & Gas Corp.	Henry G. Masti	Affirmative
1	Northeast Utilities	David H. Boguslawski	Affirmative
1	Northern Indiana Public Service Co.	Kevin M Largura	Affirmative
1	NorthWestern Energy	John Canavan	Affirmative
1	Ohio Valley Electric Corp.	Robert Matthey	Affirmative
1	Oklahoma Gas and Electric Co.	Marvin E VanBebber	Abstain
1	Orlando Utilities Commission	Brad Chase	Abstain
1	Otter Tail Power Company	Lawrence R. Larson	Affirmative
1	PacifiCorp	Mark Sampson	Affirmative
1	Potomac Electric Power Co.	Richard J Kafka	Affirmative
1	PowerSouth Energy Cooperative	Larry D. Avery	Negative
1	PPL Electric Utilities Corp.	Brenda L Truhe	Affirmative
1	Progress Energy Carolinas	Sammy Roberts	Affirmative
1	Public Service Electric and Gas Co.	Kenneth D. Brown	Affirmative
1	Puget Sound Energy, Inc.	Catherine Koch	Affirmative
1	Sacramento Municipal Utility District	Tim Kelley	Affirmative
1	Salt River Project	Robert Kondziolka	Affirmative
1	San Diego Gas & Electric	Linda Brown	Affirmative
1	Santee Cooper	Terry L. Blackwell	Affirmative
1	SCE&G	Henry Delk, Jr.	Affirmative
1	Seattle City Light	Pawel Krupa	Affirmative
1	Sierra Pacific Power Co.	Rich Salgo	Affirmative
1	Southern California Edison Co.	Dana Cabbell	Affirmative
1	Southern Company Services, Inc.	Horace Stephen Williamson	Affirmative
1	Southwest Transmission Cooperative, Inc.	James L. Jones	Affirmative
1	Southwestern Power Administration	Gary W Cox	Affirmative
1	Tampa Electric Co.	Thomas J. Szelistowski	Negative
1	Tri-State G & T Association, Inc.	Keith V. Carman	Affirmative
1	Westar Energy	Allen Klassen	Affirmative
1	Western Area Power Administration	Brandy A Dunn	Affirmative

1	Xcel Energy, Inc.	Gregory L Pieper	Affirmative	
2	Alberta Electric System Operator	Jason L. Murray	Affirmative	
2	BC Transmission Corporation	Faramarz Amjadi	Affirmative	
2	Electric Reliability Council of Texas, Inc.	Chuck B Manning	Negative	<a href="#">View</a>
2	Florida Municipal Power Pool	Thomas E Washburn	Affirmative	
2	Independent Electricity System Operator	Kim Warren	Affirmative	<a href="#">View</a>
2	ISO New England, Inc.	Kathleen Goodman	Affirmative	
2	Midwest ISO, Inc.	Jason L Marshall	Affirmative	
2	New Brunswick System Operator	Alden Briggs	Affirmative	
2	New York Independent System Operator	Gregory Campoli		
2	PJM Interconnection, L.L.C.	Tom Bowe	Affirmative	
2	Southwest Power Pool	Charles H Yeung	Affirmative	
3	Alabama Power Company	Bobby Kerley	Affirmative	
3	Ameren Services	Mark Peters	Affirmative	
3	American Electric Power	Raj Rana	Affirmative	
3	Atlantic City Electric Company	James V. Petrella	Affirmative	
3	BC Hydro and Power Authority	Pat G. Harrington	Abstain	
3	Black Hills Power	Andy Butcher	Affirmative	
3	Bonneville Power Administration	Rebecca Berdahl	Affirmative	
3	City of Bartow, Florida	Matt Culverhouse	Affirmative	
3	City of Clewiston	Lynne Mila	Affirmative	
3	City of Farmington	Linda R. Jacobson	Affirmative	
3	City of Green Cove Springs	Gregg R Griffin	Affirmative	
3	Consolidated Edison Co. of New York	Peter T Yost	Affirmative	
3	Consumers Energy	David A. Lapinski	Affirmative	
3	Cowlitz County PUD	Russell A Noble	Affirmative	
3	CPS Energy	Edwin Les Barrow		
3	Delmarva Power & Light Co.	Michael R. Mayer	Affirmative	
3	Detroit Edison Company	Kent Kujala	Affirmative	
3	Dominion Resources, Inc.	Jalal (John) Babik	Affirmative	
3	Duke Energy Carolina	Henry Ernst-Jr	Affirmative	
3	Entergy Services, Inc.	Matt Wolf	Affirmative	
3	FirstEnergy Solutions	Kevin Querry	Affirmative	<a href="#">View</a>
3	Florida Municipal Power Agency	Joe McKinney	Affirmative	
3	Florida Power & Light Co.	W. R. Schoneck	Abstain	
3	Florida Power Corporation	Lee Schuster	Abstain	
3	Gainesville Regional Utilities	Kenneth Simmons	Affirmative	
3	Georgia Power Company	Anthony L Wilson	Affirmative	
3	Georgia System Operations Corporation	R Scott S. Barfield-McGinnis	Abstain	
3	Grays Harbor PUD	Wesley W Gray	Affirmative	
3	Great River Energy	Sam Kokkinen	Affirmative	
3	Gulf Power Company	Gwen S Frazier	Affirmative	
3	Hydro One Networks, Inc.	Michael D. Penstone	Affirmative	
3	JEA	Garry Baker	Affirmative	
3	Kansas City Power & Light Co.	Charles Locke	Affirmative	
3	Kissimmee Utility Authority	Gregory David Woessner	Affirmative	
3	Lakeland Electric	Mace Hunter	Affirmative	
3	Lincoln Electric System	Bruce Merrill	Affirmative	
3	Louisville Gas and Electric Co.	Charles A. Freibert	Abstain	
3	Manitoba Hydro	Greg C Parent	Affirmative	
3	MidAmerican Energy Co.	Thomas C. Mielnik	Affirmative	
3	Mississippi Power	Don Horsley	Affirmative	
3	Municipal Electric Authority of Georgia	Steven M. Jackson		
3	New York Power Authority	Marilyn Brown	Affirmative	
3	Niagara Mohawk (National Grid Company)	Michael Schiavone	Affirmative	
3	Northern Indiana Public Service Co.	William SeDoris	Affirmative	
3	Ocala Electric Utility	David T. Anderson	Affirmative	
3	Orlando Utilities Commission	Ballard Keith Muters	Affirmative	
3	PacifiCorp	John Apperson	Affirmative	
3	Platte River Power Authority	Terry L Baker	Affirmative	
3	Potomac Electric Power Co.	Robert Reuter	Affirmative	
3	Progress Energy Carolinas	Sam Waters	Affirmative	
3	Public Service Electric and Gas Co.	Jeffrey Mueller	Affirmative	
3	Public Utility District No. 2 of Grant County	Greg Lange	Affirmative	
3	Sacramento Municipal Utility District	James Leigh-Kendall	Affirmative	
3	Salt River Project	John T. Underhill	Affirmative	
3	San Diego Gas & Electric	Scott Peterson		

3	Santee Cooper	Zack Dusenbury	Affirmative	
3	Seattle City Light	Dana Wheelock	Affirmative	
3	South Carolina Electric & Gas Co.	Hubert C. Young	Affirmative	
3	Southern California Edison Co.	David Schiada	Affirmative	
3	Tampa Electric Co.	Ronald L. Donahey	Negative	
3	Wisconsin Electric Power Marketing	James R. Keller	Affirmative	
3	Wisconsin Public Service Corp.	Gregory J. Le Grave	Affirmative	
3	Xcel Energy, Inc.	Michael Ibold	Affirmative	
4	Alliant Energy Corp. Services, Inc.	Kenneth Goldsmith	Affirmative	
4	City of Clewiston	Kevin McCarthy	Affirmative	
4	City of New Smyrna Beach Utilities Commission	Timothy Beyrle	Affirmative	
4	Consumers Energy	David Frank Ronk	Affirmative	
4	Detroit Edison Company	Daniel Herring	Affirmative	
4	Florida Municipal Power Agency	Frank Gaffney	Affirmative	
4	Fort Pierce Utilities Authority	Thomas W. Richards	Affirmative	
4	Georgia System Operations Corporation	Guy Andrews	Abstain	
4	Integrus Energy Group, Inc.	Christopher Plante	Affirmative	
4	Madison Gas and Electric Co.	Joseph G. DePoorter	Abstain	
4	Northern California Power Agency	Fred E. Young	Affirmative	
4	Ohio Edison Company	Douglas Hohlbaugh	Affirmative	
4	Old Dominion Electric Coop.	Mark Ringhausen	Affirmative	
4	Public Utility District No. 1 of Douglas County	Henry E. LuBean	Affirmative	
4	Sacramento Municipal Utility District	Mike Ramirez	Affirmative	
4	Seattle City Light	Hao Li	Affirmative	
4	Seminole Electric Cooperative, Inc.	Steven R. Wallace		
4	Wisconsin Energy Corp.	Anthony Jankowski	Affirmative	<a href="#">View</a>
5	AEP Service Corp.	Brock Ondayko	Affirmative	
5	Amerenue	Sam Dwyer	Affirmative	
5	Avista Corp.	Edward F. Groce	Abstain	
5	Bonneville Power Administration	Francis J. Halpin	Affirmative	
5	City of Tallahassee	Alan Gale	Affirmative	
5	City Water, Light & Power of Springfield	Karl E. Kohlrus	Affirmative	
5	Colmac Clarion/Piney Creek LP	Harvie D. Beavers	Affirmative	
5	Consolidated Edison Co. of New York	Edwin Thompson	Affirmative	
5	Consumers Energy	James B. Lewis	Affirmative	
5	Dairyland Power Coop.	Warren Schaefer	Affirmative	
5	Detroit Edison Company	Ronald W. Bauer	Affirmative	
5	Dominion Resources, Inc.	Mike Garton	Affirmative	
5	Duke Energy	Robert Smith	Affirmative	
5	Entergy Corporation	Stanley M. Jaskot	Affirmative	
5	FirstEnergy Solutions	Kenneth Dresner	Affirmative	
5	Florida Municipal Power Agency	David Schumann	Affirmative	
5	Great River Energy	Cynthia E. Sulzer	Affirmative	
5	JEA	Donald Gilbert	Abstain	
5	Kansas City Power & Light Co.	Scott Heidtbrink	Affirmative	
5	Kissimmee Utility Authority	Mike Blough	Affirmative	
5	Lakeland Electric	Thomas J. Trickey	Affirmative	
5	Lincoln Electric System	Dennis Florom	Affirmative	
5	Louisville Gas and Electric Co.	Charlie Martin	Abstain	
5	Manitoba Hydro	Mark Aikens	Affirmative	
5	MidAmerican Energy Co.	Christopher Schneider	Negative	
5	New York Power Authority	Gerald Mannarino		
5	NextEra Energy Resources, LLC	Benjamin Church		
5	Northern Indiana Public Service Co.	Michael K. Wilkerson	Affirmative	
5	Orlando Utilities Commission	Richard Kinan		
5	PacifiCorp	Sandra L. Shaffer	Abstain	
5	Portland General Electric Co.	Gary L. Tingley		
5	PowerSouth Energy Cooperative	Tim Hattaway	Affirmative	
5	PPL Generation LLC	Mark A. Heimbach	Affirmative	
5	Progress Energy Carolinas	Wayne Lewis	Affirmative	
5	PSEG Power LLC	David Murray	Affirmative	
5	Reedy Creek Energy Services	Bernie Budnik	Affirmative	
5	RRI Energy	Thomas J. Bradish	Affirmative	
5	Sacramento Municipal Utility District	Bethany Wright	Affirmative	
5	Salt River Project	Glen Reeves	Affirmative	
5	Seattle City Light	Michael J. Haynes	Affirmative	

5	Seminole Electric Cooperative, Inc.	Brenda K. Atkins		
5	South California Edison Company	Ahmad Sanati		
5	South Carolina Electric & Gas Co.	Richard Jones	Affirmative	
5	South Mississippi Electric Power Association	Jerry W Johnson	Affirmative	
5	Tenaska, Inc.	Scott M. Helyer	Abstain	
5	U.S. Army Corps of Engineers Northwestern Division	Karl Bryan	Affirmative	
5	U.S. Bureau of Reclamation	Martin Bauer P.E.	Abstain	
5	Wisconsin Electric Power Co.	Linda Horn	Affirmative	
5	Wisconsin Public Service Corp.	Leonard Rentmeester	Affirmative	
5	Xcel Energy, Inc.	Liam Noailles	Affirmative	
6	AEP Marketing	Edward P. Cox	Affirmative	
6	Ameren Energy Marketing Co.	Jennifer Richardson	Affirmative	
6	Black Hills Corp	Tyson Taylor		
6	Bonneville Power Administration	Brenda S. Anderson	Affirmative	
6	Consolidated Edison Co. of New York	Nickesha P Carrol	Affirmative	
6	Constellation Energy Commodities Group	Chris Lyons	Affirmative	
6	Dominion Resources, Inc.	Louis S Slade	Abstain	
6	Duke Energy Carolina	Walter Yeager	Affirmative	
6	Entergy Services, Inc.	Terri F Benoit	Affirmative	
6	Eugene Water & Electric Board	Daniel Mark Bedbury	Affirmative	
6	FirstEnergy Solutions	Mark S Travaglianti	Affirmative	
6	Florida Municipal Power Agency	Richard L. Montgomery	Affirmative	
6	Florida Power & Light Co.	Silvia P Mitchell		
6	Great River Energy	Donna Stephenson	Affirmative	
6	Kansas City Power & Light Co.	Thomas Saitta	Affirmative	
6	Lakeland Electric	Paul Shipp	Affirmative	
6	Lincoln Electric System	Eric Ruskamp	Affirmative	
6	Louisville Gas and Electric Co.	Daryn Barker	Abstain	
6	Manitoba Hydro	Daniel Prowse	Affirmative	
6	New York Power Authority	Thomas Papadopoulos	Affirmative	
6	Northern Indiana Public Service Co.	Joseph O'Brien	Affirmative	
6	Omaha Public Power District	David Ried	Abstain	
6	PacifiCorp	Gregory D Maxfield	Affirmative	
6	Progress Energy	James Eckelkamp	Affirmative	
6	PSEG Energy Resources & Trade LLC	James D. Hebson	Affirmative	
6	Public Utility District No. 1 of Chelan County	Hugh A. Owen	Affirmative	
6	RRI Energy	Trent Carlson	Affirmative	
6	Salt River Project	Mike Hummel	Affirmative	
6	Santee Cooper	Suzanne Ritter	Affirmative	
6	Seattle City Light	Dennis Sismaet	Affirmative	
6	Seminole Electric Cooperative, Inc.	Trudy S. Novak		
6	Southern California Edison Co.	Marcus V Lotto	Affirmative	
6	Western Area Power Administration - UGP Marketing	John Stonebarger	Affirmative	
6	Xcel Energy, Inc.	David F. Lemmons	Affirmative	
8		James A Maenner	Affirmative	
8		Edward C Stein	Abstain	
8		Roger C Zaklukiewicz	Affirmative	
8	JDRJC Associates	Jim D. Cyrulewski	Affirmative	
8	Power Energy Group LLC	Peggy Abbadini		
8	Volkman Consulting, Inc.	Terry Volkman	Affirmative	
9	California Energy Commission	William Mitchell Chamberlain	Affirmative	
9	Commonwealth of Massachusetts Department of Public Utilities	Donald E. Nelson	Affirmative	
9	Maine Public Utilities Commission	Jacob A McDermott	Abstain	
9	Utah Associated Municipal Power Systems	Tom Florence	Negative	
10	Electric Reliability Council of Texas, Inc.	Kent Saathoff	Negative	<a href="#">View</a>
10	Florida Reliability Coordinating Council	Linda Campbell	Abstain	
10	Midwest Reliability Organization	Dan R. Schoenecker	Affirmative	
10	New York State Reliability Council	Alan Adamson	Affirmative	
10	Northeast Power Coordinating Council, Inc.	Guy V. Zito	Affirmative	
10	ReliabilityFirst Corporation	Jacque Smith		
10	SERC Reliability Corporation	Carter B Edge	Abstain	
10	Western Electricity Coordinating Council	Louise McCarren	Affirmative	



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NORTH AMERICAN ELECTRIC  
RELIABILITY CORPORATION

## Standards Announcement Final Ballot Results for Three Interpretations

Now available at: <https://standards.nerc.net/Ballots.aspx>

Recirculation Ballots for the following interpretations have closed and all three interpretations were approved by their associated ballot pools.

### Project 2008-09 – Interpretation of EOP-001-0 Emergency Operations Planning Requirement R1 for the Regional Entity Compliance Managers

The recirculation ballot for this interpretation ended October 14, 2010. Voting statistics are listed below, and the [Ballot Results](#) Web page provides a link to the detailed results:

Quorum: 88.11%  
Approval: 99.14%

The request and interpretation can be found on the project page:

[http://www.nerc.com/filez/standards/EOP-001-0\\_ Interpretation\\_RECM.html](http://www.nerc.com/filez/standards/EOP-001-0_ Interpretation_RECM.html)

### Project 2009-28 – Interpretation of EOP-001-1, EOP-001-2 – Emergency Operations Planning for the Florida Municipal Power Pool

The recirculation ballot for this interpretation ended October 15, 2010. Voting statistics are listed below, and the [Ballot Results](#) Web page provides a link to the detailed results:

Quorum: 92.19%  
Approval: 94.78%

The request and interpretation can be found on the project page:

[http://www.nerc.com/filez/standards/Project2009-28\\_EOP-001-1-2\\_R2.2\\_FMPP.html](http://www.nerc.com/filez/standards/Project2009-28_EOP-001-1-2_R2.2_FMPP.html)

### Project 2009-27 – Interpretation of TOP-002-2a – Normal Operations Planning for the Florida Municipal Power Pool

The recirculation ballot for this interpretation ended October 16, 2010. Voting statistics are listed below, and the [Ballot Results](#) Web page provides a link to the detailed results:

Quorum: 91.21%  
Approval: 93.44%

The request and interpretation can be found on the project page:

[http://www.nerc.com/filez/standards/Project2009-27\\_TOP-002-2a\\_R10\\_RFI\\_FMPP.html](http://www.nerc.com/filez/standards/Project2009-27_TOP-002-2a_R10_RFI_FMPP.html)





## Next Steps

All three interpretations will be presented to the Board of Trustees for approval.

## Standards Process

The [Standard Processes Manual](#) contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate.

*For more information or assistance, please contact Monica Benson,  
Standards Process Administrator, at [monica.benson@nerc.net](mailto:monica.benson@nerc.net) or at 609.452.8060.*

North American Electric Reliability Corporation  
116-390 Village Blvd.  
Princeton, NJ 08540  
609.452.8060 | [www.nerc.com](http://www.nerc.com)



**Exhibit H**

**Roster of the Interpretation Drafting Team for the Interpretation of Requirement  
R1 of EOP-001-0 — Emergency Operations Planning**

## Project 2008-09 Interpretation of EOP-001-0 for RECM

Name and Title Affiliation Contact Info	Bio
<p>Colleen Frosch Manager of System Operations</p> <p>Electric Reliability Council of Texas 2705 West Lake Drive Taylor, Texas 76574</p> <p>(512) 248-4219 <a href="mailto:cfrosch@ercot.com">cfrosch@ercot.com</a></p>	<p>Colleen Frosch is the vice chair of the NERC Operations Reliability Subcommittee (ORS), as well as a member of the NERC Reliability Coordinator Working Group (RCWG) and the ORS Executive Committee. Colleen has over 20 years of experience in the utility industry with the bulk of her career spent in system operations. At ERCOT, where she has been employed since 1996, Colleen is responsible for real-time operations which include the Reliability Coordinator (RC), Balancing Authority (BA), and Transmission Operator (TOP) functions, as well as the Training program for the ERCOT ISO System Operators. Prior to ERCOT, Colleen worked for 12 years at Central and South West Services. Colleen received an Associates of Applied Science in 1995 and has been a NERC Certified System Operator at the RC level since Sept. 1998.</p>
<p>Frank Koza Executive Director Operations Support</p> <p>PJM Interconnection 955 Jefferson Avenue Norristown, PA 19403</p> <p>(610) 666-4228 (610) 666-4286 Fx <a href="mailto:kozaf@pjm.com">kozaf@pjm.com</a></p>	<p>Frank J. Koza is the chair of the NERC Operations Reliability Subcommittee and vice chair of the NERC Geomagnetic Task Force. He received a BSME Degree from the University of Pennsylvania, a Master of Engineering Degree from Widener University and is also a registered professional engineer in the State of Pennsylvania (PE028372E). He has almost 39 years experience in the utility industry with experience in system operations, system planning, transmission construction and maintenance. At PJM, Frank is responsible for system operations processes, except for the control room operators. Prior to PJM, Frank worked for 29 years at PECO Energy in a variety of positions in transmission and generation..</p>
<p>Don M. Shipley Director, SPP Operations</p> <p>Southwest Power Pool 415 N McKinley Little Rock, AR 72205</p> <p>(501) 614-3581 (501) 851-1784 Fax <a href="mailto:dshipley@spp.org">dshipley@spp.org</a></p>	<p>Don M. Shipley is the Chairman of the NERC Reliability Coordinator Working Group (RCWG), as well as a member of the NERC Operating Reliability Subcommittee (ORS) and the ORS Executive Committee. He received a Bachelor of Science degree in Organizational Management from John Brown University in Siloam Springs, Arkansas. Don has 33 years of experience in the utility industry with experience in Distribution Emergency Operations, Transmission System Operations and is a NERC Certified System Operator (RC200506247). Currently at Southwest Power Pool (SPP) Don is responsible for real time operations including Reliability Coordination, Energy Imbalance Market, Tariff Administration, and Interchange functions. Prior to SPP, he was a System Operator in the Reliability Coordinator (RC) and Balancing Authority (BA) functions at Entergy for 7 years. Don worked for 21 years at TXU in Dallas, Texas in various positions in the Distribution function.</p>
<p>Joel G. Wise Manager Reliability Operations</p>	<p>Joel G. Wise is a member of the NERC Operating Reliability Subcommittee (ORS), as well as the ORS Executive Committee. He is also a member of the NERC Reliability Coordinator Working Group. He currently serves as the</p>

<p>Tennessee Valley Authority 1101 Market St., PCC 02A Chattanooga, TN 37402</p> <p>(423) 697-4165 (423) 697-4120 Fax <a href="mailto:igwise@tva.gov">igwise@tva.gov</a></p>	<p>Chair of the Southeastern Reliability Corporation (SERC) Reliability Coordinator Subcommittee. Joel has almost 23 years of experience in the utility industry. Currently at TVA Joel manages the two 24X7 operating desks that provide Reliability Coordinator services for the TVA Reliability Coordinator Area. Prior to this he was a System Operator in the Reliability Coordinator (RC) Balancing Authority (BA) functions. Joel worked for 13 years at Duke Energy Carolinas. Joel began as a Generator Operator in conventional and pumped storage hydro. He then moved into system operations working as a System Operator in the RC, BA, Interchange Authority (IA), Transmission Service Provider (TSP) functions. Joel is NERC certified at the RC level.</p>
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**Exhibit I**

**Roster of the Interpretation Drafting Team for the Interpretation of Requirement  
R3.2 of EOP-001-0 — Emergency Operations Planning**

**Project 2009 - 28 EOP-001-2 and EOP-001-2 R2.2 - Interpretation Drafting Team**

<p align="center"><b>Name and Title Affiliation Contact Info</b></p>	<p align="center"><b>Bio</b></p>
<p>Richard Kafka (Retired)</p> <p>PEPCO Holdings, Inc. 4009 Highview Drive Silver Springs, MD 20906</p> <p>Business : (301) 946-5515 Cell: (601) 594-6736</p> <p>vahrjk@verizon.net</p>	<p>Mr. Kafka was assigned to Pepco’s system restoration study team in 1979, which produced one of the first formal power flow studies for a system restoration plan. This plan and the process used to develop it were published as IEEE Transactions. As a result, IEEE established the Power System Restoration Working Group and Mr. Kafka was a charter member. Mr. Kafka is a Fellow of the IEEE, elected based on his system restoration planning contributions. Mr. Kafka supervised all Pepco system restoration plan developments since 1979. Mr. Kafka was part of the Violation Risk Factors SDT - the VRF SDT has reviewed all requirements for every standard and has identified general issues to be addressed on the standards. Mr. Kafka also served as Chair of the System Restoration and Blackstart SDT.</p>
<p>Francis Esselman Managing Partner</p> <p>Proven Compliance Solutions</p> <p>Business: (262) 510-2446 Cell: (608) 509-5908</p> <p>fesselman@provencompliance.com</p>	<p>Mr. Esselman has 36 years of industry experience in fossil plant operations and system operations management. He recently (until Feb. 2010) managed Forward Operations engineering at American Transmission Co. where he was involved in almost every aspect of transmission operations, operations planning, and transmission interconnection processes. As part of Emergency planning coordination related to project 2009-28 Mr. Esselman has been an industry leader in the emergency operations areas including for MISO development of the blackstart tariff technical papers and has held leadership roles on the blackstart system restoration emergency response subcommittee also in MISO. Mr. Esselman has led most aspects of Operations major emergency response coordination since 1990 at Wisconsin Power &amp; Light Co. and subsequently at Alliant Energy and American Transmission Co. where the emergency plans of the four contributing companies were combined into a single Transmission Operations emergency plan that is coordinated with the then local Balancing Areas. Mr. Esselman is currently an independent consultant with an emphasis on emergency planning and NERC standards.</p>

<p>Mark Kuras Senior Lead Engineer</p> <p>PJM Interconnection, L.L.C. 955 Jefferson Avenue Valley Forge Corporate Center Norristown, PA 19403 Business : (610) 666-8924 Cell: (484) 994-8324</p> <p>kuras@pjm.com</p>	<p>Mr. Kuras has 22 years of Planning and standards development experience. He is the current Chairman of the NERC Reliability Assessment Subcommittee and the NERC Data Coordination Subcommittee. He also chairs three ReliabilityFirst standard drafting teams; one on generator verification, one on system restoration and blackstart, and one on underfrequency load shedding. He also served as a member of the NERC System Restoration and Blackstart Standard Drafting Team and several other NERC and RFC standards drafting teams. Mark has extensive experience on NERC compliance (as an auditor and planning compliance lead). He was the past chair and present database coordinator of the Eastern Interconnection Reliability Assessment Group's Multiregional Modeling Working Group (ERAG MMWG). Mr. Kuras has worked at PJM for 16 years in Planning, Compliance and Regional Coordination. Mark previously worked at Northeast Power Coordinating Council in Planning and New York Power Authority in Operations Planning.</p>
<p>David Mahlmann Manager, Operations Engineering</p> <p>New York Independent System Operator 3890 Carman Road Schenectady, NY 12303</p> <p>Business: (518) 356-6101</p> <p>dmahlmann@nyiso.com</p>	<p>Mr. Mahlmann has 33 years of industry experience in fossil plant operations, transmission planning, operations engineering, and system operator training. He serves as a member of the Northeast Power Coordinating Council Restoration Working Group, and is a continuing member of the NYISO Restoration Working Group. Mr. Mahlmann has led the development of the NYISO System Operations Training Simulator. This tool allows remote monitoring and participation, and provides a real time look and feel to restoration exercises. David incorporated simulation into the NYISO System Operating Training Seminars, the NYISO annual restoration drill, and the NPCC Multi-Area Restoration exercises. Mr. Mahlmann is currently the Manager of Operations Engineering at the New York ISO; among other responsibilities, his staff conducts the review and expansion of the NYISO Restoration Plan.</p>

<p>Steve Cooper</p> <p>Independent Electricity System Operator Station A Box 4474 Toronto, ON L5J 4R9</p> <p>Business: (905) 855-6159</p> <p>steve.cooper@ieso.ca</p>	<p>Biographic information not available.</p>
<p>Al McMeekin Standards Development Coordinator</p> <p>North American Electric Reliability Corporation 116-390 Village Boulevard Princeton, NJ 08540</p> <p>Business: (803) 530-1963</p> <p>al.mcmeekin@nerc.net</p>	<p>Al McMeekin is the NERC Staff Coordinator for this interpretation response development team. Prior to joining NERC in 2009 as a Standards Development Coordinator, Mr. McMeekin worked at South Carolina Electric &amp; Gas Company (SCE&amp;G) for 29 years with various assignments in engineering and operations within the Distribution and Transmission Groups. In Transmission Operations Planning, Mr. McMeekin was the lead engineer responsible for: providing the day ahead and real-time operational plans to System Control; overseeing the monthly transmission billing functions and inadvertent checkout; administering the SCE&amp;G OATT and developing business practices; participating in SCE&amp;G's ERO Working Group to ensure compliance with NERC standards; and representing SCE&amp;G on various national, regional, and subregional groups. Mr. McMeekin was a member of the SERC Operating Committee and served as Chair of the SERC Operations Planning Subcommittee. Al was a member of the SERC Standards Committee and the SERC Available Transfer Capability Working Group. He also served as Chair of the VACAR South Reliability Coordinator Procedures Working Group and was a member of NERC's System Restoration and Blackstart Standards Drafting Team. Al is a graduate of Clemson University and is a licensed Professional Engineer in the states of South Carolina and Georgia.</p>