

Consideration of Comments on First Ballot of EOP-005-1

Summary Consideration of Comments: EOP-005 is a Version 0 standard that was modified to add requirements from Phase III & IV. The drafting team appointed to modify EOP-005 is limited to modifying only those requirements or measures that need to be modified because of the addition of the Phase III & IV measures. The drafting team cannot modify already approved Version 0 requirements that aren't related to the Phase III & IV measures, and the drafting team cannot add measures or compliance elements for Version 0 requirements that aren't related to the Phase III & IV measures – making these modifications is considered to be outside the scope of work identified in the SARs approved for the Phase III & IV measures. The drafting team posted a copy of the proposed EOP-005-1 that shows a red line to Version 0. The red line to Version 0 clearly shows the modifications made to the Version 0 EOP-005 for the Phase III & IV measures. Most of the comments submitted with the first ballot of EOP-005-1 ask the drafting team to modify the portions of EOP-005 that are asking for changes to requirements and measures that were developed with Version 0 and are outside the scope of the Phase III & IV drafting team. There is another drafting team already in place that is working to add measures and compliance elements to this standard. There were nine comments submitted with a negative vote. Several comments asked for clarification on the intent in R4 with respect to coordinating restoration plans with Generator Owners. The intent is to coordinate with all Generator Owners who are involved in the plan – there would be nothing to coordinate with Generator Owners who are not involved in the plan.

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Gerry Cauley at 609-452-8060 or at gerry.cauley@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

Company	Balloter	Yes	No	Comment
Baltimore Gas & Electric Company	John Moraski		No	We vote to NOT support the standard. As written, it is not clear whether: 1. Each Transmission Operator is required to have each of its System Operators trained annually in the system restoration plan. 2. Each Transmission Operator is required to have each of its System Operators participate annually in a System Restoration Drill. 3. Or both 1 and 2. BGE would vote for this standard if it was a requirement that each System Operator receive training on an annual basis on the System Restoration Plan and if it was a requirement that each System Operator participate in a System Restoration Drill on a less frequent basis than annually.
<p>Response: The requirement to train system operators is a Version 0 requirement and was not added or modified by the Phase III & IV drafting team. The requirement to have system operators participate in system restoration drills is a Version 0 requirement that was not added or modified by the Phase III & IV drafting team.</p> <p>For a formal interpretation of the requirements that are outside the scope of the Phase III & IV Drafting Team in EOP-005, please follow the process outlined in the Reliability Standards Process Manual for 'Interpretations'. If you wish to recommend changes to the requirements that</p>				

¹ The appeals process is in the Reliability Standards Process Manual: <http://www.nerc.com/standards/newstandardsprocess.html>.

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<p>are outside the scope of the Phase III & IV Drafting Team, please consult the Reliability Standards Process Manual on how to submit a Standards Authorization Request.</p>				
<p>Hydro One Networks Inc.</p>	<p>Ajay Garg</p>		<p>No</p>	<ol style="list-style-type: none"> 1. Although Hydro One believes that the standard is necessary the proposed draft is not ready for adoption. Requirement R4 specifies “Each Transmission Operator shall coordinate its restoration plans with the Generator Owners.” This needs clarification as to whether this means that ALL generators within the footprint of the TO must be notified and the plans coordinated with them. This would normally occur during a system restoration but not necessarily when developing a plan to restore the system. This plan may only involve Blackstart generators or cranking path generation owner coordination. The drafting team should clarify what their intent of coordination is. 2. Requirement R3 is not appropriate, as it states that the restoration plans should give priority to restoring the integrity of the Interconnection. We believe that the highest priority must be given to restoring the TOP and BA’s own system before dealing with the interconnection, i.e. fist go through the actions listed in R11.5. As a matter of fact, it might not be desirable to interconnect a system still weak to other areas. 3. Again, in Section D. Compliance, 1.4.1 should state that restoration of loads should be done after system restoration. System restoration should be the first priority. 4. Levels of Non-Compliance 2.2 and 2.4.1 need to be reconciled with Attachment 1. The elements in the Attachment are not mandatory given the use of the words "consider" and "as applicable". However, the Levels of Non-Compliance in Section 2 make it clear that all elements in the Attachment must be addressed in the Restoration Plan. The Implementation plan should be revised to explicitly state that addressed does not mean included.
<p>Response:</p> <ol style="list-style-type: none"> 1. The intent of R4 was to ensure that all entities involved in the restoration plan should be aware of that restoration plan. Thus, R4 was intended to mean all Generator Owners within the Transmission Operator’s area that are included in the plan – there is nothing to ‘coordinate’ with Generator Owners that are not included in the plan. The drafting team believes it is more appropriate to ensure that Generator Owners know they are included in a restoration plan Before the plan is needed, not in the middle of a critical restoration activity. 2. R3 is a Version 0 requirement that was not added or modified by the Phase III & IV drafting team – and making changes to R3 is outside the scope of the Phase III & IV drafting team’s work. 				

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				<p>3. Although Section D. Compliance 1.4.1 is shown in 'red' on the red line version of EOP-005, this was in the Version 0 EOP-005 but was moved from the 'Compliance Monitoring Responsibility' section of the standard to the 'Additional Compliance Information' section of the standard. The Phase III & IV drafting team did not add or modify this language and making changes to this language is outside the scope of the Phase III & IV drafting team's work.</p> <p>4. Please review the red-line version of EOP-005 that shows the changes to the Version 0 EOP-005. The levels of non-compliance that you want changed were developed and approved with Version 0 – they were not added or modified as part of the Phase III & IV drafting team's work.</p>
Hydro One Networks Inc	Mike Penstone		No	<p>1. Although Hydro One believes that the standard is necessary the proposed draft is not ready for adoption. Requirement R4 specifies "Each Transmission Operator shall coordinate its restoration plans with the Generator Owners." This needs clarification as to whether this means that ALL generators within the footprint of the TO must be notified and the plans coordinated with them. This would normally occur during a system restoration but not necessarily when developing a plan to restore the system. This plan may only involve Blackstart generators or cranking path generation owner coordination. The drafting team should clarify what their intent of coordination is.</p> <p>2. Requirement R3 is not appropriate, as it states that the restoration plans should give priority to restoring the integrity of the Interconnection. We believe that the highest priority must be given to restoring the TOP and BA's own system before dealing with the interconnection, i.e. fist go through the actions listed in R11.5. As a matter of fact, it might not be desirable to interconnect a system still weak to other areas.</p> <p>3. Again, in Section D. Compliance, 1.4.1 should state that restoration of loads should be done after system restoration. System restoration should be the first priority.</p> <p>4. Levels of Non-Compliance 2.2 and 2.4.1 need to be reconciled with Attachment 1. The elements in the Attachment are not mandatory given the use of the words "consider" and "as applicable". However, the Levels of Non-Compliance in Section 2 make it clear that all elements in the Attachment must be addressed in the Restoration Plan. The Implementation plan should be revised to explicitly state that addressed does not mean included.</p>
<p>Response:</p> <p>1. The intent of R4 was to ensure that all entities involved in the restoration plan should be aware of that restoration plan. Thus, R4 was intended to mean all Generator Owners within the Transmission Operator's area that are included in the plan – there is nothing to 'coordinate' with Generator Owners that are not included in the plan. The drafting team believes it is more appropriate to ensure that</p>				

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				<p>Generator Owners know they are included in a restoration plan Before the plan is needed, not in the middle of a critical restoration activity.</p> <p>2. The intent of posting this red-line version was to make it easier for balloters to see which requirements, measures and compliance elements were added for Phase III & IV measures. R3 is a Version 0 requirement that was not added or modified by the Phase III & IV drafting team – and making changes to R3 is outside the scope of the Phase III & IV drafting team's work.</p> <p>3. Although Section D. Compliance 1.4.1 is shown in 'red' on the red line version of EOP-005, this was in the Version 0 EOP-005 but was moved from the 'Compliance Monitoring Responsibility' section of the standard to the 'Additional Compliance Information' section of the standard. The Phase III & IV drafting team did not add or modify this language and making changes to this language is outside the scope of the Phase III & IV drafting team's work.</p> <p>4. Please review the red-line version of EOP-005 that shows the changes to the Version 0 EOP-005. The levels of non-compliance that you want changed were developed and approved with Version 0 – they were not added or modified as part of the Phase III & IV drafting team's work.</p>
IESO	Don Tench		No	<p>While the IESO continues to support the standard in general we respectfully disagree with the Standards Drafting Team's approach of evolving NERC standards piecemeal. Further, we disagree with exclude recommended meaningful changes to the standards, received during the comment period, because it is "outside the scope of this drafting team". An approach which is contrary to NERC's response contained in its May 2005 standards bulletin to questions NPCC members raised on this vary matter.</p> <p>Following is the extract from the Q&A section of the May Standards bulletin. A similar question was raised by NPCC Compliance Monitoring and Assessment Subcommittee (CMAS) for EOP-005, which also contains a similar attachment:</p> <p>Question: EOP-001 "Emergency Operations Planning" contains an attachment "Elements for Consideration in Development of Emergency Plans". Are 'elements for consideration' in attachments mandatory or optional?</p> <p>Answer: Several standards, such as EOP-001, include an attachment with 'elements for consideration'. It is intended that responsible entities shall review and consider these elements and use the elements that are applicable for their system. This approach was used as a transitional step to accommodate useful information from the operating policies that was not necessarily applicable to all entities. In the future, as standards are revised, it would be expected that minimum requirements would be defined so as to be more uniformly applicable to all entities performing a certain function.</p> <p>Specifically, requirement R1 specifies that only the applicable elements of</p>

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				<p>attachment 1 need be included within the plan while the level 2 and level 4 non-compliance is based on exclusion of elements from the attachment. Recommendations were made by the IESO and others during the comment period for the inclusion of"applicable "...in the compliance levels to be consistent with the requirement. The IESO also suggested an appropriate definition or guidelines to be added to the the standard to help explain what constitutes "Applicable elements".</p> <p>The drafting team response: R1 is an existing Version 0 Requirement. Modifying the existing Version 0 requirements that are unrelated to the Phase III & IV measures associated with the SARs assigned to this drafting team is outside the scope of this drafting team. For an interpretation of an already approved standard, please follow the process in the Reliability Standards Process Manual for Interpretations (pages 25-26).</p> <p>Suggestions/Recommendations: Incorporated changes to the standards received during the comment period that are appropriate and improve the standard overall even though they are outside of the scope of the original SAR.</p> <p>Conclusion Once again, we thank the standards drafting team for their efforts and commend the team for the many improvements this standard incorporates.</p> <p>The IESO appreciates the opportunity to table these comments and looks forward to participating further in the standards development process.</p>
<p>Response:</p> <p>The SAC has determined that a drafting team can reduce its scope but may not expand its scope. The scope of the Phase III & IV drafting team is limited to adding and modifying requirements, measures and compliance elements that are related to the addition of the Phase III & IV measures.</p> <p>The information you referenced from the May standards bulletin isn't applicable to this situation. The sentence, "In the future, as standards are revised, it would be expected that minimum requirements would be defined so as to be more uniformly applicable to all entities performing a certain function." was intended to address a different type of standard revision. As part of the standards process, each approved standard must be reviewed on a periodic basis and updated if needed. (See the Reliability Standards Process Manual page 31) ftp://ftp.nerc.com/pub/sys/all_updl/oc/stp/RSPM_V4_Final.pdf</p> <p>During that 'five-year review', the entire standard is open for revision. Note that if you feel strongly that this standard needs to be modified to address your concerns, you may submit a SAR that requests these changes be made to EOP-005.</p>				

Company	Balloter	Yes	No	Comment
International Transmission Company	Jim Cyrulewski		No	<p>ITCTransmission is voting No on this standard. While ITCTransmission supports the need for a standard that ensures the plans, procedures and resources are available to restore the electric system to a normal condition after a major system disturbance, ITCTransmission cannot support the standard as proposed. ITCTransmission is a stand-alone transmission company owning only transmission assets.</p> <p>The standard includes actions that require generation ownership. The following changes need to be made to make the standard acceptable to ITCTransmission. Section A4.</p> <ol style="list-style-type: none"> 1. Add item 4.4 Generator Owners (Comment: This standard should apply to generation owners as well.) 2. Section B.R4. Add Distribution Providers. (Comment: Cannot restore the system unless load matches generation. Need to work with distribution providers to coordinate the matching.) 3. Section B.R10. Change to read "The Generation Owner shall demonstrate through testing that the blackstart generating units in the Transmission Operator restoration plan can perform their intended function as required in the regional restoration plan." 4. Section B.R10.1 Change to read "The Generation Owner shall perform this testing of each identified blackstart unit at least once every three years and provide documentation to the Regional Reliability Organization and the Transmission Operator." 5. Section B.R11. Add Requirement. "The Transmission Operator shall demonstrate through yearly simulation that the restoration plan can be performed as required in the regional restoration plan." 6. Section B.R11 and B.R11.2 Add Generator Operators 7. Section C.M1. Change to read "The Generation Owner shall within 30 calendar days of a request, provide its Regional Reliability Organization and the Transmission Operator with documentation of test that demonstrate the blackstart units perform their intended function as required in the Regional restoration plan." 8. Section C.M3. Add new measure. "The Transmission Operator shall within 60 calendar of a request, provide its Regional Reliability Organization with documentation of simulation results that demonstrate the Transmission Operator restoration plan can be performed with the intended functions as required in the Regional restoration plan."

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				<p>9. Section D.1.4 Regional Reliability Organizations should require submission of all relevant compliance documents annually. This would allow the RRO to spot check and verify compliance with the standard. Section D.1.4.7 This provision is only applicable to the Generation Owner Compliance. Other alternative is to add a Section D.1.5 for Generator Owners Additional Compliance Information that would include versions of D.1.4.1, D.1.4.2, D.1.4.3 and D.1.4.7 Section D.1.4</p> <p>10. Create Section 1.6 for Balancing Authority with similar provisions D.1.4.1 to D.1.4.4 Section 2.4.1 Plan exist, but compliance with other provisions of the standard have not been met</p> <p>11. Section 2.4.3 Eliminate “or test”</p> <p>12. Section 2 Need to create similar levels of Non-Compliance for Generation Operators and Balancing Authorities. Attachment 1-EOP-005-0 2. The provision for reliable black start capability plan including Cranking paths, alternate paths, internal communication and alternate power supplies Note: Provisions for adequate black start fuel supplies should included in the Generation Owner compliance standard</p>
<p>Response: Most of the changes you've recommended are to portions of the standard that were developed with Version 0 and were not added or modified by the Phase III & IV drafting team. The drafting team has a scope that is limited to making changes related to the addition of Phase III & IV measures.</p> <ol style="list-style-type: none"> 1. The drafting team did not add any requirements for the Generator Owner, therefore the drafting team cannot add the Generator Owner to the applicability section of the standard. 2. The drafting team did not add any requirements for the Distribution Provider, therefore the drafting team cannot add the Distribution Provider to the applicability section of the standard. 3. The intent of R10 is to verify that the plan is correct, not to verify that the unit can start – there is another standard with requirements to test the functionality of the blackstart unit. 4. The intent of this testing is to verify that the plan is correct, not to verify that the unit can start – there is another standard with requirements to test the functionality of the blackstart unit. 5. Adding the requested requirement is outside the scope of the work assigned to the Phase III & IV drafting team. 6. In R11, the Generator Operator is working at the direction of the Balancing Authority. 7. The intent of the testing in R10 is to verify that the plan is correct, not to verify that the unit can start. 8. The proposed measure addresses Version 0 requirements, not requirements added for Phase III & IV. 9. Expanding on the scope of the compliance elements developed for Version 0 requirements that were not changed as a result of adding the Phase III & IV measures is outside the scope of the work assigned to this drafting team. 10. The drafting team did not add or modify any of the Version 0 requirements for the Balancing Authority - adding compliance elements for 				

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<p>existing Version 0 requirements that were not changed as a result of adding the Phase III & IV measures is outside the scope of the work assigned to this drafting team.</p> <p>11. The word, 'test' is appropriate since this matches the language in Requirement 10 which states, "...shall demonstrate, through simulation or testing . . ."</p> <p>12. Adding compliance information unrelated to the Phase III & IV measures that were added to this Version 0 standard is outside the scope of the work assigned to this drafting team.</p>				
New Brunswick Power Transmission Corporation	Wayne Snowdon		No	<p>1. R-4 specifies "Each Transmission Operator shall coordinate its restoration plans with the Generator Owners." Many who read this seem to believe that this means ALL generators within the footprint of the TO must be notified and the plans coordinated with them. This would normally occur during a system restoration but not necessarily when developing a plan to restore the system. This plan may only involve Blackstart generators or cranking path generation owner coordination. The drafting team should clarify what their intent of coordination is.</p> <p>2. Levels of Non-Compliance 2.2 and 2.4.1 need to be reconciled with Attachment 1. The elements in the Attachment are not mandatory given the use of the words "consider" and "as applicable". However, the Levels of Non-Compliance in Section 2 make it clear that all elements in the Attachment must be addressed in the Restoration Plan. The Implementation plan should be revised to explicitly state that addressed does not mean included.</p>
<p>Response:</p> <p>1. The intent of R4 was to ensure that all entities involved in the restoration plan should be aware of that restoration plan. Thus, R4 was intended to mean all Generator Owners within the Transmission Operator's area that are included in the plan – there is nothing to 'coordinate' with Generator Owners that are not included in the plan. The drafting team believes it is more appropriate to ensure that Generator Owners know they are included in a restoration plan Before the plan is needed, not in the middle of a critical restoration activity.</p> <p>2. The levels of non-compliance that you want changed were developed and approved with Version 0 – they were not added or modified as part of the Phase III & IV drafting team's work.</p>				

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Niagara Mohawk NMPC	Michael Schivone		No	<p>R-4 specifies “Each Transmission Operator shall coordinate its restoration plans with the Generator Owners.” This should be clarified to pertain only to generators needed for black start. During implementation, the remaining generators will be started as station service is provided to them.</p> <p>Levels of Non-Compliance 2.2 and 2.4.1 need to be reconciled with Attachment 1. The elements in the Attachment are not mandatory given the use of the words "consider" and "as applicable". However, the Levels of Non-Compliance in Section 2 make it clear that all elements in the Attachment must be addressed in the Restoration Plan. The Implementation plan should be revised to explicitly state that addressed does not mean included.</p>
<p>Response:</p> <ol style="list-style-type: none"> 1. The intent of R4 was to ensure that all entities involved in the restoration plan should be aware of that restoration plan. Thus, R4 was intended to mean all Generator Owners within the Transmission Operator's area that are included in the plan – there is nothing to 'coordinate' with Generator Owners that are not included in the plan. The drafting team believes it is more appropriate to ensure that Generator Owners know they are included in a restoration plan Before the plan is needed, not in the middle of a critical restoration activity. 2. The levels of non-compliance that you want changed were developed and approved with Version 0 – they were not added or modified as part of the Phase III & IV drafting team's work. 				
Detroit Edison	Ronald Bauer		No	<p>Concern with R10 requirement. This requirement should be separated, in that the generator owner should be responsible for testing of the generator unit starting capability, whereas the simulation of the system that shows that the generating unit performed its intended functions for the system once it starts, is the transmission operator responsibility. For non-vertically integrated companies these are not the same entity.</p>
<p>Response: The intent of R10 is to verify that the restoration plan is correct – that's why simulation is an acceptable option to actual testing. EOP-009 contains requirements to test the blackstart units to verify that they will work as intended.</p>				

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Company	Balloter	Yes	No	Comment
North Carolina Utilities Commission	Sam Watson		No	<p>While not wanting to appear as a grammatical stickler, the NCUC is discouraged by the prevalence of such errors in the version of this standard put forward for a vote. The NCUC is concerned that such errors may lead to ambiguity in interpretation or enforcement.</p> <p>Specifically, Section D.1.4 purports to list "criteria" for which each Transmission Owner (TO) is required to annually self-certify its compliance to the Regional Reliability Organization (RRO). Pursuant to Sections D.1.4.5, D.1.4.6, and D.1.4.7, the TO self-certifies that "units are sufficient," that "paths ... have been documented," and that "units ... can perform." Sections D.1.4.1, D.1.4.2, and D.1.4.3, however, are not similarly drafted. Moreover, Section D.1.4.4 does not appear to be a criteria to be self-certified at all, but a requirement that the TO, in addition to its annual self-certification, report to the RRO any changes to its restoration plan. Similarly, the list of "requirements" listed in Attachment 1 that must be considered in developing a restoration plan are not parallel because some include verbs and others do not. The NCUC believes that these errors should be corrected before the standard is approved in order to eliminate the potential for confusion and to ensure consistent compliance with the intended requirements. The NCUC, therefore, votes not to approve this standard as currently written.</p>
<p>Response: The issues you've identified are contained within sections of the standard that were developed and approved with Version 0 standards. Making modifications to these sections of the standard is outside the scope of this drafting team.</p>				
Gainesville Regional Utilities GVL	Mark Lee Bennett		No	<p>Can't agree due to additional requirements added that GRU can't meet at this time . ie execution or full simulation of plan.</p>
<p>Response: There are two requirements in EOP-005 that require simulation or testing – R7 and R10. R7 (the requirement the drafting team thinks you are referencing) was approved with the original Version 0 EOP-005 and states: Each Transmission Operator and Balancing Authority shall verify the restoration procedure by actual testing or by simulation.</p> <p>The Phase III & IV drafting team added Requirement 10: The Transmission Operator shall demonstrate, through simulation or testing, that the blackstart generating units in its restoration plan can perform their intended functions as required in the regional restoration plan.</p>				
NE-ISO	Kathleen Goodman		No	<p>ISO New England suggests that the following changes be made:</p> <ol style="list-style-type: none"> 1. R-4 specifies that "Each Transmission Operator shall coordinate its restoration plans with the Generator Owners." We believe that this seem to read as though ALL generators within the footprint of the TO must be coordinated with. It is more appropriate to require that the plan be coordinated with the generators involved in the restoration activities.

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				<p>2. Levels of Non-Compliance 2.2 and 2.4.1 need to be reconciled with Attachment 1. The elements in the Attachment are not mandatory given the Title “Elements for Consideration in Development of Restoration Plans.” NERC has also reinforced this understanding in their Q&A section of the May Standards bulletin (ftp://www.nerc.com/pub/sys/all_updl/standards/bulletins/standards-bulletin-0505.pdf), a similar question was raised and the response given was “Several standards, such as EOP-001, include an attachment with 'elements for consideration'. It is intended that responsible entities shall review and consider these elements and use the elements that are applicable for their system. This approach was used as a transitional step to accommodate useful information from the operating policies that was not necessarily applicable to all entities. In the future, as standards are revised, it would be expected that minimum requirements would be defined so as to be more uniformly applicable to all entities performing a certain function.”</p> <p>While ISO New England strongly believes and supports the need for NERC Standards and generally believes there are many positive attributes embedded in this Standard, we believe it requires further refinement.</p>
<p>Response:</p> <ol style="list-style-type: none"> 1. The intent of R4 was to ensure that all entities involved in the restoration plan should be aware of that restoration plan. Thus, R4 was intended to mean all Generator Owners within the Transmission Operator’s area that are included in the plan – there is nothing to ‘coordinate’ with Generator Owners that are not included in the plan. The drafting team believes it is more appropriate to ensure that Generator Owners know they are included in a restoration plan Before the plan is needed, not in the middle of a critical restoration activity. 2. The levels of non-compliance that you want changed were developed and approved with Version 0 – they were not added or modified as part of the Phase III & IV drafting team’s work. The SAC has determined that a drafting team can reduce its scope but may not expand its scope. The scope of the Phase III & IV drafting team is limited to adding and modifying requirements, measures and compliance elements that are related to the addition of the Phase III & IV measures. <p>The information you referenced from the May standards bulletin isn’t applicable to this situation. The sentence, “In the future, as standards are revised, it would be expected that minimum requirements would be defined so as to be more uniformly applicable to all entities performing a certain function.” was intended to address a different type of standard revision. As part of the standards process, each approved standard must be reviewed on a periodic basis and updated if needed. (See the Reliability Standards Process Manual page 31) ftp://ftp.nerc.com/pub/sys/all_updl/oc/stp/RSPM_V4_Final.pdf</p> <p>During that ‘five-year review’, the entire standard is open for revision. Note that if you feel strongly that this standard needs to be modified to address your concerns, you may submit a SAR that requests these changes be made to EOP-005.</p>				

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American Transmission Company LLC ATC	Peter Burke	Yes		<ol style="list-style-type: none"> 1. The Balancing Authority is identified in the Section A Applicability for this standard but is not identified anywhere in Section D Compliance. The SDT should review this issue and determine if they have identified the correct Applicable entities. 2. In Section D Compliance 1.4.1 states that the Transmission Operator should identify critical loads. The SDT should beware that a Transmission Operator has no load. Critical loads can only be identified by a Balancing Authority or Load Serving Entity.
<p>Response:</p> <ol style="list-style-type: none"> 1. None of the requirements added by the Phase III & IV drafting team were applicable to the Balancing Authority – so the Phase III & IV drafting team did not add any measures or levels of non-compliance for the Balancing Authority. The requirements for the Balancing Authority were developed during Version 0 – and there are no measures and only limited levels of non-compliance for the Version 0 requirements. Note that there is another drafting team (Missing Measures and Compliance Elements drafting team) that is working to add the missing measures and/or levels of non-compliance to all the Version 0 standards that were incomplete when approved. 2. The compliance elements that you referenced were developed and approved with Version 0 – they were not added as part of the Phase III & IV drafting team’s work – they were merely moved from the ‘Compliance Monitoring Responsibility’ section to the ‘Additional Compliance Information’ section. 				
Avista Corp. AVA	Scott James Kinney	Yes		Several comments were suggested during the review of this standard to add additional measures to the standard so that there is a measurement for every requirement. The Drafting team indicated that this was outside their scope of work. Please make sure the other drafting team that is adding measures and compliance elements to those Version 0 Standards that were missing these elements, review and consider the comments that this drafting team (EOP-005-1) were unable to address.
<p>Response: The Missing Measures and Compliance Elements drafting team is working to add measures and levels of non-compliance to all 22 Version 0 standards that were incomplete when approved, including EOP-005.</p>				
Great River Energy GRE	Gordon Pietsch	Yes		Non-compliance item 2.3 (level 3) should be moved to level 2, based on a comparison with the non-compliance item 2.2
<p>Response: If documentation is not provided when requested, it is presumed to be non-existent. This is a more serious infraction than having incomplete documentation.</p>				

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Nova Scotia Power NSPI	David D Little	Yes		"Levels of Non-Compliance 2.2 and 2.4.1 need to be reconciled with Attachment 1. The elements in the Attachment are to be given consideration, however, the Levels of Non-Compliance in Section 2 make it clear that all elements in the Attachment must be addressed in the Restoration Plan. The Implementation plan should be revised to explicitly state that addressed does not mean included.
Response: The levels of non-compliance that you want changed were developed and approved with Version 0 – they were not added or modified as part of the Phase III & IV drafting team’s work.				
San Diego Gas & Electric Co. SDGE	Linda P Brown	Yes		SDG&E votes to approve this SAR and supports the WECC position that the other drafting team (which is assigned the task) add the measures and compliance elements to the Version 0 Standards that are missing.
Response: The Missing Measures and Compliance Elements drafting team is working to add measures and levels of non-compliance to all 22 Version 0 standards that were incomplete when approved, including EOP-005.				
SaskPower SPC	Wayne Guttormson	Yes		SaskPower recommends that Non-compliance Item 2.3 (Level 3) should be moved to level 2, based on a comparison with the Non-Compliance Item 2.2.
Response: If documentation is not provided when requested, it is presumed to be non-existent. This is a more serious infraction than having incomplete documentation.				
Alberta Electric System Operator AESO	Anita Lee	Yes		<ol style="list-style-type: none"> 1. The AESO has the following comments: R4. should require the Generator Owners to have plans and to coordinate with the Transmission Operators. 2. R9. The term “the initial switching” reduces flexibility to the Operators to respond to contingencies. 3. R10. It is not clear what the plan required. It should be part of R7. 4. R11.5. Should exclude islands within a system that do not affect surrounding areas.
<p>Response:</p> <ol style="list-style-type: none"> 1. Making the modification suggested to R4 goes beyond the scope of work assigned to this drafting team. 2. The term, ‘initial switching’ is used to give the system operators flexibility. History has shown that beyond the first few switching steps, most system restoration plans can’t be followed in a ‘cookbook’ fashion because the conditions assumed to be present when the plan was developed are unlikely to match the actual conditions. 3. In R10, the use of the adjective, ‘its’ refers back to the TOP – the TOP’s restoration plan. The drafting team thinks that adding this to R7 would add confusion. 4. R11.5 is a Version 0 requirement, and making modifications to this would be outside the scope of the work assigned to the Phase III & IV drafting team. 				

Consideration of Comments on First Ballot of EOP-005-1

Company	Balloter	Yes	No	Comment
Midwest Reliability Organization	William J. Head	Yes		Non-compliance Item 2.3 (Level 3) should be moved to level 2, based on a comparison with the Non-Compliance Item 2.2.
Response: If documentation is not provided when requested, it is presumed to be non-existent. This is a more serious infraction than having incomplete documentation.				
New Brunswick System Operator	Alden Briggs	Yes		Levels of Non-Compliance 2.2 and 2.4.1 need to be reconciled with Attachment 1. The elements in the Attachment are not mandatory given the use of the words "consider" and "as applicable". However, the Levels of Non-Compliance in Section 2 make it clear that all elements in the Attachment must be addressed in the Restoration Plan. The Implementation plan should be revised to explicitly state that addressed does not mean included.
Response: The levels of non-compliance that you want changed were developed and approved with Version 0 – they were not added or modified as part of the Phase III & IV drafting team’s work.				
New York Independent System Operator NYIS	Gregory Campoli	Yes		<ol style="list-style-type: none"> 1. The NYISO would like to raise the following concerns: R-4 specifies “Each Transmission Operator shall coordinate its restoration plans with the Generator Owners.” Many who read this seem to believe that this means ALL generators within the footprint of the TO must be notified and the plans coordinated with them. This would normally occur during a system restoration but not necessarily when developing a plan to restore the system. This plan may only involve Blackstart generators or cranking path generation owner coordination. The drafting team should clarify what their intent of coordination is. 2. Levels of Non-Compliance 2.2 and 2.4.1 need to be reconciled with Attachment 1. The elements in the Attachment are not mandatory given the use of the words "consider" and "as applicable". However, the Levels of Non-Compliance in Section 2 make it clear that all elements in the Attachment must be addressed in the Restoration Plan. The Implementation plan should be revised to explicitly state that addressed does not mean included.
<p>Response:</p> <ol style="list-style-type: none"> 1. The intent of R4 was to ensure that all entities involved in the restoration plan should be aware of that restoration plan. Thus, R4 was intended to mean all Generator Owners within the Transmission Operator’s area that are included in the plan – there is nothing to ‘coordinate’ with Generator Owners that are not included in the plan. The drafting team believes it is more appropriate to ensure that Generator Owners know they are included in a restoration plan Before the plan is needed, not in the middle of a critical restoration activity. 2. The levels of non-compliance that you want changed were developed and approved with Version 0 – they were not added or modified as part of the Phase III & IV drafting team’s work. 				

Consideration of Comments on First Ballot of EOP-005-1

Company	Balloter	Yes	No	Comment
Northeast Power Coordinating Council	Edward Schwerdt	Yes		Levels of Non-Compliance 2.2 and 2.4.1 need to be reconciled with Attachment 1. The elements in the Attachment are not mandatory given the use of the words "consider" and "as applicable". However, the Levels of Non-Compliance in Section 2 make it clear that all elements in the Attachment must be addressed in the Restoration Plan. The Implementation plan should be revised to explicitly state that addressed does not mean included.
Response: The levels of non-compliance that you want changed were developed and approved with Version 0 – they were not added or modified as part of the Phase III & IV drafting team’s work.				
Consumers Energy CETR	David Lapinski	Yes		We would recommend that the following addition be made to Requirement R4: ". . . its restoration plans with the Generator Owners, Load Serving Entities, and Balancing Authorities . . ." (Load Serving Entities added)
Response: The drafting team is limited to making changes that are needed as a result of adding the Phase III & IV measures to EOP-005, and the Phase III & IV measures do not include any requirements for LSEs.				
Lincoln Electric System LES	Bruce E Merrill	Yes		Non-compliance Item 2.3 (Level 3) should be moved to level 2, based on a comparison with the Non-Compliance Item 2.2.
Response: If documentation is not provided when requested, it is presumed to be non-existent. This is a more serious infraction than having incomplete documentation.				
Avista Corp. Washington Water Power Division AVWP	Edward F. Groce	Yes		Several comments were suggested during the review of this standard to add additional measures to the standard so that there is a measurement for every requirement. The Drafting team indicated that this was outside their scope of work. Please make sure the other drafting team that is adding measures and compliance elements to those Version 0 Standards that were missing these elements, review and consider the comments that this drafting team (EOP-005-1) were unable to address.
Response: The Missing Measures and Compliance Elements drafting team is working to add measures and levels of non-compliance to all 22 Version 0 standards that were incomplete when approved, including EOP-005.				
Lincoln Electric System LES	Dennis Florom	Yes		Non-compliance Item 2.3 (Level 3) should be moved to level 2, based on a comparison with the Non-Compliance Item 2.2.
Response: If documentation is not provided when requested, it is presumed to be non-existent. This is a more serious infraction than having incomplete documentation.				
California Energy Commission	William Mitchell Chamberlain	Yes		1. Several WECC Members have commented in the past on this standard, suggesting additional measures be added to the standard so that there is a

Consideration of Comments on First Ballot of EOP-005-1

Company	Balloter	Yes	No	Comment
				<p>measurement for every requirement. Recognizing the limited scope of this SAR, we are voting yes on this but encourage future drafting teams to work to improve this standard further.</p> <p>2. In addition, levels of Non-Compliance 2.2 and 2.4.1 need to be reconciled with Attachment 1. The elements in the Attachment are not mandatory given the use of the words "consider" and "as applicable". However, the Levels of Non-Compliance in Section 2 make it clear that all elements in the Attachment must be addressed in the Restoration Plan. The Implementation plan should be revised to explicitly state that addressed does not mean included.</p>
<p>Response:</p> <ol style="list-style-type: none"> 1. The Missing Measures and Compliance Elements drafting team is working to add measures and levels of non-compliance to all 22 Version 0 standards that were incomplete when approved, including EOP-005. 2. The levels of non-compliance that you want changed were developed and approved with Version 0 – they were not added or modified as part of the Phase III & IV drafting team’s work. 				
National Association of Regulatory Utility Commissioners	Diane Jean Barney	Yes		<p>Levels of Non-Compliance 2.2 and 2.4.1 need to be reconciled with Attachment 1. The elements in the Attachment are not mandatory given the use of the words "consider" and "as applicable". However, the Levels of Non-Compliance in Section 2 make it clear that all elements in the Attachment must be "addressed" in the Restoration Plan. The Implementation plan should be revised to explicitly state that "addressed" does not mean "included."</p>
<p>Response: The levels of non-compliance that you want changed were developed and approved with Version 0 – they were not added or modified as part of the Phase III & IV drafting team’s work.</p>				
New York State Public Service Commission	James T Gallagher	Yes		<p>Levels of Non-Compliance 2.2 and 2.4.1 need to be reconciled with Attachment 1. The elements in the Attachment are not mandatory given the use of the words "consider" and "as applicable". However, the Levels of Non-Compliance in Section 2 make it clear that all elements in the Attachment must be "addressed" in the Restoration Plan. The Implementation plan should be revised to explicitly state that "addressed" does not mean "included."</p>
<p>Response: The levels of non-compliance that you want changed were developed and approved with Version 0 – they were not added or modified as part of the Phase III & IV drafting team’s work.</p>				
Wyoming Public Service Commission	Kathleen Lewis	Yes		<p>WECC comments merit serious consideration.</p>
<p>Response: WECC did not submit any comments.</p>				

