

## EOP Five-Year Review Team Consideration of Industry Expert Review Panel Recommendations on EOP-001, -002, and -003 September 23, 2013

Standard	Requirement	IERP Recommendations	
			Reason
1. EOP-001-2.1b	R6.		P81. Duplicative of Requirement R4 and the Attachment.
2. EOP-002-3.1	R2.		P81. Duplicative. The requirement to take action is in Requirement R1.
3. EOP-002-3.1	R3.		P81. Duplicative of what is required to be in the plan under Attachment 1 of EOP-001-2.1b.
4. EOP-002-3.1	R6.		P81. Duplicative of BAL standards to meet CPS and DPS.
5. EOP-002-3.1	R9.		P81. This is a market (tariff) issue.
6. EOP-003-2	R2.		P81. Duplicative of PRC-010 and TPL standards.
7. EOP-003-2	R4.		P81. Duplicative of PRC-010 and TPL standards.
8. EOP-003-2	R5.		P81. Duplicative of Requirement R1 and also covered under standards for TOP (TOP-002-3).
9. EOP-003-2	R6.		P81. Duplicative. An entity does the same actions as when not islanded.
10. EOP-003-2	R7.		P81. Duplicative of PRC-010 Requirement R1.

## EOP FYRT Consideration of Independent Expert Review Panel Recommendations

As part of their EOP Five-Year Review, the EOP FYRT has evaluated the Industry Expert Review Panel's findings related to the EOP standards and generally agrees with their recommendations, with exceptions and further considerations for the standard drafting team as noted below:

- **EOP-001-2.1b** – the EOP FYRT concurs with the recommendation to retire R6 in accordance with the applicable Paragraph 81 criteria (Requirements 6.1 and 6.3 under Criterion B7; Requirement R6.2 under Criterion B6; and Requirement R6.4 under Criterion A). In addition, the EOP FYRT also recommends that the future EOP SDT take into consideration retiring Requirements R3.1 under Criterion B7, Requirement R3.2 under Criterion B7 and Criterion A, and Requirement R3.4 under Criterion B1 of Paragraph 81. The EOP FYRT further recommends revising and merging EOP-001-2.b and EOP-002-3.1 into a single standard; revising Requirements R1, R2 and R5 and a review of Attachment 1.
- **EOP-002-3.1** – in addition to Requirements R6 and R9, the EOP FYRT recommends retiring Requirements R1 under Criterion B7 of Paragraph 81. The EOP FYRT further recommends that the future EOP SDT consider revising and merging EOP-001-2.b and EOP-002-3.1 into a single standard, which will include revising Requirement R3 and Attachment 1.
- **EOP-003-2** - the EOP FYRT recommends Requirements R2, R4 and R7 be moved to PRC-010-0 and revised in accordance with the other requirements in that standard. In addition to merging EOP-001-2.1b with EOP-002-3.1, the EOP FYRT recommends the future EOP SDT consider merging EOP-003-2, EOP-001-1-2.1b and EOP-002-3.1 into a single standard.

The EOP FYRT strongly recommends that the future EOP SDT consider merging and revising EOP-001-2.b and EOP-002-3.1 into a single standard. This will not only streamline and clarify the requirements after applying the Paragraph 81 criteria, but also will invoke the continuous improvement cycle of the reliability standards towards RBS which supports the RAI initiative with the objective of moving to a more sustainable Compliance and Enforcement Program.

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