

Consideration of Comments

Project Name: 2015-02 EOP Periodic Review | EOP-005-2

Comment Period Start Date: 3/27/2015

Comment Period End Date: 5/11/2015

The Industry Segments are:

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

Full Name	Entity Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Region	Group Member Segment(s)
Ben Engelby	ACES Power Marketing	6		ACES Standards Collaborators - EOP Project	Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	RFC	1
					John Shaver	Arizona Electric Power Cooperative, Inc. Southwest Transmission Cooperative, Inc.	WECC	1,4,5
					Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	3,5
					Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
					Kevin Lyons	Central Iowa Power Cooperative	MRO	1
					Ginger Mercier	Prairie Power, Inc.	SERC	3

					Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
					Bill Hutchison	Southern Illinois Power Cooperative	SERC	1,5
					Mark Ringhausen	Old Dominion Electric Cooperative	RFC	3,4
Ben Li	Independent Electricity System Operator	2	NPCC	ISO/RTO Council Standards Review Committee	Charles Yeung	SPP	SPP	2
					Greg Campoli	NYISO	NPCC	2
					Ali Miremadi	CAISO	WECC	2
					Ben Li	IESO	NPCC	2
					Kathleen Goodman	ISO-NE	NPCC	2
Connie Lowe	Dominion - Dominion Resources, Inc.	3		Dominion Collective Group	Randi Heise	NERC Compliance Policy	NA - Not Applicable	1,3,5,6
					Louis Slade	NERC Compliance Policy	NA - Not Applicable	1,3,5,6
					Connie Lowe	NERC Compliance Policy	NA - Not Applicable	1,3,5,6
					Chip Humphrey	Power Generation Compliance	SERC	5
					Nancy Ashberry	Power Generation Compliance	RFC	5
					Dan Goynes	Power Generation Compliance	SERC	5
					Jarad L Morton	Power Generation Compliance	NPCC	5
Larry Nash	Electric Transmission Compliance	SERC	1,3					

					Angela Park	Electric Transmission Compliance	SERC	1,3
					Candace L Marshall	Electric Transmission Compliance	SERC	1,3
					Larry Bateman	Electric Transmission Compliance	SERC	1,3
					Jeffrey N Bailey	Nuclear Compliance	SERC	5
					Tom Huber	Nuclear Compliance	NPCC	5
Emily Rousseau	MRO	1,2,3,4,5,6	MRO	MRO-NERC Standards Review Forum (NSRF)	Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
					Amy Casucelli	Xcel Energy	MRO	1,3,5,6
					Chuck Lawrence	American Transmission Company	MRO	1
					Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
					Dan Inman	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
					Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
					Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
					Jodi Jenson	Western Area Power Administration	MRO	1,6
					Larry Heckert	Alliant Energy	MRO	4
					Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
					Marie Knox	Midwest ISO Inc.	MRO	2

					Mike Brytowski	Great River Energy	MRO	1,3,5,6
					Randi Nyholm	Minnesota Power	MRO	1,5
					Scott Nickels	Rochester Public Utilities	MRO	4
					Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
					Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
					Tony Eddleman	Nebraska Public Power District	MRO	1,3,5
Jason Smith	Southwest Power Pool, Inc. (RTO)	2	SPP	SPP Standards Review Group	Shannon Mickens	Southwest Power Pool	SPP	2
					James Nail	City of Independence, Missouri	SPP	3,5
					Gary Cox	Southwest Power Administration	SPP	1
					Mike Kidwell	Empire District Electric Company	SPP	1,3,5
					Brandon Levander	Nebraska Public Power District	MRO	1,3,5
					Mahmood Safi	Omaha Public Power District	MRO	1,3,5
					Sing Tay	Oklahoma Gas and Electric Company	SPP	1,3,5,6
John Seelke	Public Service Enterprise Group	1,3,5,6	NPCC,R FC	PSEG	Joseph Smith	Public Service Electric and Gas	RFC	1
					Jeffrey Mueller	Public Service Electric and Gas Co.	RFC	3

					Tim Kucey	PSEG Fossil LLC	RFC	5
					Stephen York	PSEG Energy Resources & Trade LLC	RFC	6
Joseph Bencomo	PPL NERC Registered Affiliates	1,3,5,6	MRO,W ECC,NP CC,SER C,SPP,R FC	PPL NERC Registered Affiliates	Charlie Freibert	LG&E and KU Energy, LLC	SERC	3
					Brenda Truhe	PPL Electric Utilities Corporation	RFC	1
					Don Lock	PPL Generation, LLC	RFC	5
					Don Lock	PPL Susquehanna, LLC	RFC	5
					Don Lock	PPL Montana, LLV	WECC	5
					Elizabeth Davis	PPL EnergyPlus	RFC	6
					Elizabeth Davis	PPL EnergyPlus	WECC	6
					Elizabeth Davis	PPL EnergyPlus	MRO	6
					Elizabeth Davis	PPL EnergyPlus	NPCC	6
					Elizabeth Davis	PPL EnergyPlus	SPP	6
					Elizabeth Davis	PPL EnergyPlus	SERC	6
					Charlie Freibert	LG&E and KU Energy, LLC	SERC	3
Kaleb Brimhall	Colorado Springs Utilities	5		Colorado Springs Utilities	Shawna Speer	Colorado Springs Utilities	WECC	1
					Charlie Morgan	Colorado Springs Utilities	WECC	3
					Shannon Fair	Colorado Springs Utilities	WECC	6

					Kaleb Brimhall	Colorado Springs Utilities	WECC	5
Lee Pedowicz	Northeast Power Coordinating Council	10	NPCC	NPCC Proj 2015-02 EOP-005-2	Alan Adamson	New York State Reliability Council, LLC	NPCC	10
					David Burke	Orange and Rockland Utilities Inc.	NPCC	3
					Greg Campoli	New York Independent System Operator	NPCC	2
					Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
					Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
					Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
					Kathleen Goodman	ISO - New England	NPCC	2
					Mark Kenny	Northeast Utilities	NPCC	1
					Helen Lainis	Independent Electricity System Operator	NPCC	2
					Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
					Paul Malozewski	Hydro One Networks Inc.	NPCC	1
					Bruce Metruck	New York Power Authority	NPCC	6
					Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Robert Pellegrini	The United Illuminating Company	NPCC	1					

					Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
					David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5
					Brian Robinson	Utility Services	NPCC	8
					Wayne Sipperly	New York Power Authority	NPCC	5
					Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
					Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
					Michael Jones	National Grid	NPCC	1
					Brian Shanahan	National Grid	NPCC	1
					Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
					Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
					Glen Smith	Entergy Services, Inc.	NPCC	5
					Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
					Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
					RuiDa Shu	Northeast Power Coordinating Council	NPCC	10

1. The EOP PRT's initial recommendation outlines several clarifying revisions to EOP-005-2. Do you agree with the EOP PRT's recommended revisions? If not, please explain specifically what aspects of the recommendation you disagree with.

Summary:

The EOP PRT recommends that the future SDT incorporate into Requirement R1 “develop, maintain, and implement” and review Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard.

The EOP PRT maintains that Requirement R12 will not be retired because it is not viewed as training.

The EOP PRT recommends Requirement R4 be reviewed for clarity regarding the application of when the 90 calendar days applies and update the associated Measure, if applicable.

The EOP PRT recommends that the future SDT look at Requirement R5 and its associated Measure for consideration of the use of “Implementation Date” versus “Effective Date” or “Approval Date” and consider if the plan should contain the specific term “Implementation Date.”

The EOP PRT will recommend that the future SDT review options for clarification steady state and dynamic simulations. The EOP PRT will recommend that the future SDT review the terms “planned” and “unplanned” and timing in Requirement R4 for clarity.

The EOP PRT does not see the need to formally define “restoration plan” in the NERC Glossary of Terms. Restoration plan is clearly understood as presented in the standard.

The EOP PRT recommends that the future SDT clarify the intent of the GOPs that are identified in the restoration plan and should update Requirement R18 accordingly.

Dennis Minton - Florida Keys Electric Cooperative Assoc. - 1 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

John Fontenot - Bryan Texas Utilities - 1 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Leonard Kula - Independent Electricity System Operator - 2 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Si Truc Phan - Hydro-Quebec TransEnergie - 1 – NPCC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Emily Rousseau - MRO - 1,2,3,4,5,6 – MRO

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Kaleb Brimhall - Colorado Springs Utilities - 5 -

Selected Answer: No

Answer Comment:

CSU agrees with the recommendations of the IERP for retirement of requirements. All requirements that the IERP recommended retiring need to be retired.

Response:

The EOP PRT recommends that the future SDT incorporate into Requirement R1 “develop, maintain, and implement” and review Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard. The EOP PRT maintains that Requirement R12 will not be retired because it is not viewed as training.

Likes: 0

Dislikes: 0

Maryclaire Yatsko - Seminole Electric Cooperative, Inc. - 1,3,4,5,6 – FRCC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Connie Lowe - Dominion - Dominion Resources, Inc. - 3 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Thomas Foltz - AEP - 5 -

Selected Answer: Yes

Answer Comment:

AEP agrees that the 90 day window within Requirement R4 needs clarification, specifically, that the plan be updated before the system modification. As part of this effort, the drafting team might consider incorporating the window into R4 itself, rather than as a sub requirement.

AEP believes that "Effective Date" should be used within R5.

AEP recommends modifying R7 to remove the "restoration plan" redundancy. For example, revising it to state "Following a Disturbance in which one or more areas of the BES shuts down, *pursuant to Requirement R1*, each affected Transmission Operator shall implement its restoration plan."

Response:

The EOP PRT recommends Requirement R4 be reviewed for clarity regarding the application of when the 90 calendar days applies and update the associated Measure, if applicable.

The EOP PRT recommends that the future SDT look at Requirement R5 and its associated Measure for consideration of the use of "Implementation Date" versus "Effective Date" or

“Approval Date” and consider if the plan should contain the specific term “Implementation Date.”

The EOP PRT recommends that the future SDT incorporate into Requirement R1 “develop, maintain, and implement” and review Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard. The EOP PRT maintains that Requirement R12 will not be retired because it is not viewed as training.

Likes: 0

Dislikes: 0

Brian Bartos - CPS Energy - 3 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Erika Doot - U.S. Bureau of Reclamation - 5 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Joel Wise - Tennessee Valley Authority - 1,3,5,6 – SERC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Nick Vtyurin - Manitoba Hydro - 1,3,5,6 – MRO

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Andrew Pusztai - American Transmission Company, LLC - 1 -

Selected Answer: No

Answer Comment:

- ATC disagrees with the Periodic Review Team's recommendation that Requirement # 6 be modified with a rationale statement requiring monitoring specific parameters within a dynamic simulation. Requirement 6.2

already states that voltage and frequency will be controlled within levels.

- ATC has a concern with the Periodic Review Teams recommendation to significantly extend the burden of the dynamic analyses related to R6. The Periodic Review Team's wording suggests a dynamic study time extension beyond the transient time period studies of 15 – 25 seconds to a midterm type study which may require an additional mid-term study package. ATC suggest that the Periodic Review team clarify its position on whether it needs more time than the typical dynamic study timeframe or whether the drafting team was referring to additional studies rather than the time length in seconds of the dynamic studies.

Response:

The EOP PRT will recommend that the future SDT review options for clarification steady state and dynamic simulations.

Likes:

0

Dislikes:

0

Lee Pedowicz - Northeast Power Coordinating Council - 10 – NPCC

Selected Answer:

No

Answer Comment:

Regarding Item a. on page 4--The Drafting Team should not only consider clarifying the 90 calendar days, but should also consider revising Requirement R4 to eliminate the “unplanned” and “planned” wording. A suggested revision:

...after identifying any BES physical or operating modification that would change the implementation of its restoration plan.

The Drafting Team should consider developing a formal definition for restoration plan for inclusion in the NERC Glossary.

Item b.--Agree.

Item c.--Agree.

Item d.--Agree.

Item e.--Agree. In the proposed Rationale Box, it should be explained that dynamic simulations should be done for System changes within a specified time frame. This may require the addition of a Part to requirement R6, or a revision to requirement R4.

Item f.--Agree.

Item g.--Agree.

Item h.--Agree.

Item i.--Agree.

Item j.--Agree.

Response:

The EOP PRT recommends Requirement R4 be reviewed for clarity regarding the application of when the 90 calendar days applies and update the associated Measure, if applicable.

The EOP PRT will recommend that the future SDT review the terms “planned” and “unplanned” and timing in Requirement R4 for clarity.

The EOP RPT does not see the need to formally define “restoration plan” in the NERC Glossary of Terms. Restoration plan is clearly understood as presented in the standard.

Likes:

0

Dislikes:

0

Molly Devine - IDACORP - Idaho Power Company - 1 -

Selected Answer:

Yes

Answer Comment:

Response:

Likes:

0

Dislikes:

0

John Seelke - Public Service Enterprise Group - 1,3,5,6 - NPCC,RFC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Mark Kenny - Northeast Utilities - 3 -

Selected Answer: No

Answer Comment:

Regarding Item a.--The Drafting Team should not only consider clarifying the 90 calendar days, but should also consider revising the requirement to eliminate the "unplanned" and "planned" wording. A suggested revision:

...after identifying any System modification that would change the implementation of its restoration plan.

Item b.--Agree.

Item c.--Agree.

Item d.--Agree.

Item e.--Agree. In the proposed Rationale Box, it should be explained that dynamic simulations should be done for System changes within a specified time frame. This may require the addition of a Part to requirement R6, or a revision to requirement R4.

Item f.--Agree.

Item g.--Agree.

Item h.--Agree.

Item i.--Agree.

Item j.--Agree.

Response:

The EOP PRT recommends Requirement R4 be reviewed for clarity regarding the application of when the 90 calendar days applies and update the associated Measure, if applicable.

The EOP PRT will recommend that the future SDT review the terms planned and unplanned and timing in Requirement R4 for clarity.

The EOP RPT does not see the need to formally define “restoration plan” in the NERC Glossary of Terms. Restoration plan is clearly understood as presented in the standard.

Likes:

0

Dislikes:

0

Matthew Beilfuss - Wisconsin Energy Corporation - 3,4,5 – RFC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Ben Engelby - ACES Power Marketing - 6 -

Selected Answer: No

Answer Comment:

(1) We disagree with the recommendation to add a rationale box to the standard. The PRT recommendations should either be to substantively change the content, add an application guideline section, or issue a guidance document outside the standards development process. Rationale boxes are removed from the standard after they become finalized. Adding a guideline section would be a better option.

(2) We also disagree with the PRT's recommendation to strike "Blackstart Resources" and replace it with "the restoration plan, pursuant to R1." The title of this standard

is “System Restoration from Blackstart Resources.” Why is the team considering removing the underlying purpose of the standard?

Response:

Rationale boxes are not removed when standards are approved in the Results-based standards templates. They are added to the Guidance section once the standard is approved.

The EOP PRT recommends that the future SDT incorporate into Requirement R1 “develop, maintain, and implement” and review Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard. .

Likes:

0

Dislikes:

0

Kathleen Black - DTE Energy - 3,4,5 – RFC

Selected Answer:

Yes

Answer Comment:

Response:

Likes:

0

Dislikes:

0

Paul Malozewski - Hydro One Networks, Inc. - 3 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Payam Farahbakhsh - Hydro One Networks, Inc. - 1 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Joseph Bencomo - PPL NERC Registered Affiliates - 1,3,5,6 - MRO,WECC,NPCC,SERC,SPP,RFC

Selected Answer:

No

Answer Comment:

These comments are submitted on behalf of the following PPL NERC Registered Affiliates: LG&E and KU Energy, LLC; PPL Electric Utilities Corporation, PPL EnergyPlus, LLC; PPL Generation, LLC; PPL Susquehanna, LLC; and PPL Montana, LLC. The PPL NERC Registered Affiliates are registered in six regions (MRO, NPCC, RFC, SERC, SPP, and WECC) for one or more of the following NERC functions: BA, DP, GO, GOP, IA, LSE, PA, PSE, RP, TO, TOP, TP, and TSP.

We do not agree with the PRT's recommendation to add the proposed rationale box to R6. Specifically, we do not agree with the first sentence of the rationale box that "Dynamic simulations should simulate your frequency and voltage response beyond the transient period of time" assuming that the "transient period of time" is referring to the dynamic simulation associated with bringing the first blackstart unit online. Dynamic simulations are not necessary after this initial simulation as a steady state study can be performed, increasing load/generation in pre-determined amounts, to verify the system restoration plan.

Response:

The EOP PRT will recommend that the future SDT review options for clarification of steady state and dynamic simulations.

Likes:

0

Dislikes: 0

Jason Smith - Southwest Power Pool, Inc. (RTO) - 2 – SPP

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Jared Shakespeare - Peak Reliability - 1 -

Selected Answer: No

Answer Comment:

R6, R7 and R8: We agree with the PRT comments for future SDT language only because R6, R7 and R8 refer to the restoration plan as developed in R1 which specifies an area of the BES is shut down and Blackstart resources are required to restore the shut down area to service.

R4: We am neutral on the PRTs comments. We're not aware of confusion regarding the 90 calendar days to send

in a revised restoration plan to the RC if the modifications change the TOPs restoration plan. Although one could argue when the 90 days starts – after permanent changes are made or after they are expected to be permanent or ...???

R18: although not mentioned in the PRT comments, it is suggested that the requirement be specific for Gen Operators with black start resources. A similar comment will be made for EOP-006-2.

Response:

The EOP PRT recommends that the future SDT incorporate into Requirement R1 “develop, maintain, and implement” and review Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard.

The EOP PRT recommends Requirement R4 be reviewed for clarity regarding the application of when the 90 calendar days applies and update the associated Measure, if applicable.

The EOP PRT recommends that the future SDT clarify the intent of the GOPs that are identified in the restoration plan and should update Requirement R18 accordingly.

Likes: 0

Dislikes: 0

Rachel Coyne - Texas Reliability Entity, Inc. - 10 -

Selected Answer:

No

Answer Comment:

Texas RE does not agree with retiring Requirement R10. See item number two.

Texas RE is inquiring if the Periodic Review Team reached out to the EEI, APPA, BPA, and NERC to understand more about “unique tasks”?

Response:

Please see responses in Question No. 2 pertaining to Requirement R10.

The comment period for the EOP PRT recommendations was the outreach to the industry for the need for clarification and understanding of unique tasks.

Likes:

0

Dislikes:

0

RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 – SERC

Selected Answer:

Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Ben Li - Independent Electricity System Operator - 2 – NPCC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Sergio Banuelos - Tri-State G and T Association, Inc. - 1,3,5 - MRO,WECC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 – WECC

Selected Answer: No

Answer Comment:

BPA disagrees with (e) regarding R6 as there are too many variations in a networked system to do a dynamic simulation beyond the transient time. BPA also disagrees with (f) regarding R7, and (g) regarding R8 - the Standard's purpose is written for "...Restoration from Blackstart Resources.." and the PRT is wording exceeds that with the elimination wording.

BPA agrees with the rewrite of M5.

Response:

The EOP PRT recommends that the future SDT incorporate into Requirement R1 "develop, maintain, and implement" and review Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard.

The EOP PRT will recommend that the future SDT review options for clarification of steady state and dynamic simulations.

Likes: 0

Dislikes: 0

Leo Staples - OGE Energy - Oklahoma Gas and Electric Co. - 5 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

minh pham - Los Angeles Department of Water and Power - NA - Not Applicable - WECC

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Terri Pyle - OGE Energy - Oklahoma Gas and Electric Co. - 1 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Brad Ryan - Berkshire Hathaway - PacifiCorp - 6 – WECC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Joshua Andersen - Salt River Project - 1,3,5,6 – WECC**Selected Answer:** No**Answer Comment:**

SRP does not support the recommendation to retire R10. EOP-005-2 is applicable to Distribution Providers, whereas PER-005-2 is not. The retirement of that requirement would lead to a reliability gap. SRP recommends retaining R10 in EOP-005-2.

Response: Requirement R10 in EOP-005-2 is not applicable to Distribution Providers.**Likes:** 0**Dislikes:** 0

Daniela Hammons - CenterPoint Energy Houston Electric, LLC - 1 – TRE**Selected Answer:** Yes**Answer Comment:****Response:****Likes:** 0**Dislikes:** 0

2. The EOP PRT is proposing one (1) retirement of Requirement R10 in EOP-005-2. Do you agree with the EOP PRT's recommendations? If not, please explain.

Summary:

The EOP PRT does not find that there is adequate justification providing annual system restoration training for System Operators in another standard. Therefore, the EOP PRT recommends that the future SDT evaluate moving R10 into the PER family of standards; and if unable, Requirement R10 will be maintained in EOP-005.

Dennis Minton - Florida Keys Electric Cooperative Assoc. - 1 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

John Fontenot - Bryan Texas Utilities - 1 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Leonard Kula - Independent Electricity System Operator - 2 -

Selected Answer: No

Answer Comment:

We do not agree with the proposal to retire Requirement R10 as we do not believe this requirement is duplicative of any requirements in PER-005-2.

We assess that the Independent Expert Panel's recommendation to retire R10 was based on its assessment that this requirement was duplicative of R3 of PER-005-1, which stipulates that:

R3. At least every 12 months each Reliability Coordinator, Balancing Authority and Transmission

Operator shall provide each of its System Operators with at least 32 hours of emergency operations training applicable to its organization that reflects emergency operations topics, which includes system restoration using drills, exercises or other training required to maintain qualified personnel.

This recommendation appeared to be appropriate at that time. However, in PER-005-2 (revised from PER-005-1), the requirement to provide system restoration training no longer exists. In fact, the rationale to remove the minimum training requirement specific to system restoration from PER-005-1 was in part based on the existence of Requirement R10 in EOP-005-2 (and R9 in EOP-006-2).

If Requirement R10 in EOP-005 is removed, then there will not be any requirements to provide system restoration training to operating personnel in any standards. We therefore suggest that this requirement be retained.

Response:

The EOP PRT does not find that there is adequate justification providing annual system restoration training for System Operators in another standard. Therefore, the EOP PRT recommends that the future SDT evaluate moving R10 into the PER family of standards; and if unable, Requirement R10 will be maintained in EOP-005.

Likes:

0

Dislikes:

0

Si Truc Phan - Hydro-Qu?bec TransEnergie - 1 – NPCC

Selected Answer:

Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Emily Rousseau - MRO - 1,2,3,4,5,6 – MRO

Selected Answer: Yes

Answer Comment:

Please note that Systematic Approach to Training is based on the entity's BES Reliability Related Tasks. The EOP PRT has made a good point that R10 is duplicative.

Response:

The EOP PRT does not find that there is adequate justification providing annual system restoration training for System Operators in another standard. Therefore, the EOP PRT recommends that the future SDT evaluate moving R10 into the PER family of standards; and if unable, Requirement R10 will be maintained in EOP-005.

Likes: 0

Dislikes: 0

Kaleb Brimhall - Colorado Springs Utilities - 5 -

Selected Answer:

Yes

Answer Comment:

Yes this should be retired.

Response:

The EOP PRT does not find that there is adequate justification providing annual system restoration training for System Operators in another standard. Therefore, the EOP PRT recommends that the future SDT evaluate moving R10 into the PER family of standards; and if unable, Requirement R10 will be maintained in EOP-005.

Likes:

0

Dislikes:

0

Maryclaire Yatsko - Seminole Electric Cooperative, Inc. - 1,3,4,5,6 – FRCC

Selected Answer:

Yes

Answer Comment:

Response:

Likes:

0

Dislikes: 0

Connie Lowe - Dominion - Dominion Resources, Inc. - 3 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Thomas Foltz - AEP - 5 -

Selected Answer: No

Answer Comment:

R10 should not be retired unless the training of plant operators is included in PER-005-2. Please reference PER-005-2, 4.1.5.1, where it states...

Generator Operator that has:

4.1.5.1 Dispatch personnel at a centrally located dispatch center who receive direction from the Generator Operator’s Reliability Coordinator, Balancing Authority, Transmission Operator, or Transmission Owner, and may develop specific dispatch instructions for plant operators under their control. **These personnel do not include plant operators located at a generator plant site** or personnel at a centrally located dispatch center who relay dispatch instructions without making any modification.

Response:

The EOP PRT does not find that there is adequate justification providing annual system restoration training for System Operators in another standard. Therefore, the EOP PRT recommends that the future SDT evaluate moving R10 into the PER family of standards; and if unable, Requirement R10 will be maintained in EOP-005.

Likes:

0

Dislikes:

0

Brian Bartos - CPS Energy - 3 -

Selected Answer:

Yes

Answer Comment:

Response:

Likes:

0

Dislikes: 0

Erika Doot - U.S. Bureau of Reclamation - 5 -

Selected Answer: Yes

Answer Comment:

The Bureau of Reclamation (Reclamation) agrees with the PRT's recommendation to retire the training requirements in R10 as duplicative of the training program requirements established in PER-005-2.

Response:

The EOP PRT does not find that there is adequate justification providing annual system restoration training for System Operators in another standard. Therefore, the EOP PRT recommends that the future SDT evaluate moving R10 into the PER family of standards; and if unable, Requirement R10 will be maintained in EOP-005.

Likes: 0

Dislikes: 0

Joel Wise - Tennessee Valley Authority - 1,3,5,6 – SERC

Selected Answer: No

Answer Comment:

We do not agree that EOP-005 R10 is redundant with

the PER-005-2. The mapping of PER-005-1 R3 to PER-005-2 R4 is specific to RCs, BAs, TOPs, and TOs that have operational authority or control over Facilities with "established IROLs", or has "established protection systems or operating guides to mitigate IROL violations", shall use simulation technology. The intent of PER-005-2 R4 is the implementation of simulation technology to train on IROLs if the entity meets criteria "(1) and (2)" of R4, NOT to train on "system restoration".

PER-005-2 R4 does not address the "annual" training on system restoration. System restoration may have to be performed as the result of an IROL, but system restoration training is different than training on IROLs. Also, an entity may use simulation technology as part of their training program to train on system restoration, but it is not required in EOP-005-2 R10.

Response:

The EOP PRT does not find that there is adequate justification providing annual system restoration training for System Operators in another standard. Therefore, the EOP PRT recommends that the future SDT evaluate moving R10 into the PER family of standards; and if unable, Requirement R10 will be maintained in EOP-005.

Likes:

0

Dislikes:

0

Nick Vtyurin - Manitoba Hydro - 1,3,5,6 – MRO

Selected Answer:

Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -

Selected Answer: No

Answer Comment:

ERCOT does not agree with the proposal to retire Requirement R10 as it is not duplicative of any requirements in PER-005-2 since its revision. Specifically, in PER-005-2 (revised from PER-005-1), the requirement to provide system restoration training no longer exists. If Requirement R10 in EOP-005 is removed, then there will not be any requirements to provide system restoration training to operating personnel in any standards. ERCOT, therefore, suggests that this requirement be retained.

Response:

The EOP PRT does not find that there is adequate justification providing annual system restoration training for System Operators in another standard. Therefore, the EOP PRT recommends that the future SDT evaluate moving R10 into the PER family of standardcommends that the future SDT evaluate moving R10 into PER-005; and if unable, Requirement R10 will be maintained in EOP-005.

Likes: 0

Dislikes: 0

Andrew Puzstai - American Transmission Company, LLC - 1 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Lee Pedowicz - Northeast Power Coordinating Council - 10 – NPCC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Molly Devine - IDACORP - Idaho Power Company - 1 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

John Seelke - Public Service Enterprise Group - 1,3,5,6 - NPCC,RFC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Mark Kenny - Northeast Utilities - 3 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Matthew Beilfuss - Wisconsin Energy Corporation - 3,4,5 – RFC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Ben Engelby - ACES Power Marketing - 6 -

Selected Answer: Yes

Answer Comment:

(1) We agree that R10 should be retired. This is already covered in PER-005-2 systematic approach to training.

Response:

The EOP PRT does not find that there is adequate justification providing annual system restoration training for System Operators in another standard. Therefore, the EOP PRT recommends that the future SDT evaluate moving R10 into the PER family of standardcommends that the future SDT evaluate moving R10 into PER-005; and if unable, Requirement R10 will be maintained in EOP-005.

Likes: 0

Dislikes: 0

Kathleen Black - DTE Energy - 3,4,5 – RFC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Paul Malozewski - Hydro One Networks, Inc. - 3 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Payam Farahbakhsh - Hydro One Networks, Inc. - 1 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Joseph Bencomo - PPL NERC Registered Affiliates - 1,3,5,6 - MRO,WECC,NPCC,SERC,SPP,RFC

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Jason Smith - Southwest Power Pool, Inc. (RTO) - 2 – SPP

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Jared Shakespeare - Peak Reliability - 1 -

Selected Answer: No

Answer Comment:

R10: We disagree with the PRT retirement recommendation for R10. System restoration is a very low probability high risk scenario with tremendous implications to the BES. As such, specific training is necessary to be identified. There is no requirement within proposed PER-005-2 to annually train on restoration.

Response:

The EOP PRT does not find that there is adequate justification providing annual system restoration training for System Operators in another standard. Therefore, the EOP PRT recommends that the future SDT evaluate moving R10 into the PER family of standard commends that the future SDT evaluate moving R10 into PER-005; and if unable, Requirement R10 will be maintained in EOP-005.

Likes: 0

Dislikes: 0

Rachel Coyne - Texas Reliability Entity, Inc. - 10 -

Selected Answer: No

Answer Comment:

Texas RE does not agree with retiring Requirement R10. Requirement R10 specifically requires training for Blackstart and other system-restoration processes. The EOP PRT suggests that these duties are covered by the upcoming PER-005-2 Standard. While the PER-005-2 standard does require that personnel be trained for normal and emergency operations of the BES, PER-005-2 does not require any specific type of training in regards to Blackstart/system-restoration. This is problematic because the PER-005-2 standard does not directly replace EOP-005-2 R10, and leaves potential gaps when determining compliance. Registered Entities could be allowed to forgo Blackstart training, while still being compliant with PER-005-2. The requirement to perform Blackstart training will be lost if EOP-005-2, R10 is retired.

Texas RE is concerned that gaps in training could occur since entities would not have to specifically comply with the subrequirements of R10, which are necessary to understand if system restoration is needed. If a company does not consider the R10 items as "BES company-specific Real-time reliability-related tasks" per PER-005-2, compliance may be met but reliability will suffer.

Response: The EOP PRT does not find that there is adequate justification providing annual system restoration training for System Operators in another standard. Therefore, the EOP PRT recommends that the

future SDT evaluate moving R10 into the PER family of standardcommends that the future SDT evaluate moving R10 into PER-005; and if unable, Requirement R10 will be maintained in EOP-005.

Likes: 0

Dislikes: 0

RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 – SERC

Selected Answer: No

Answer Comment:

SCE&G agrees with SERC OC's comments:

We do not agree that EOP-005 R10 is redundant with the PER-005-2. The mapping of PER-005-1 R3 to PER-005-2 R4 is specific to RCs, BAs, TOPs, and TOs that have operational authority or control over Facilities with "established IROLs", or has "established protection systems or operating guides to mitigate IROL violations", shall use simulation technology. The intent of PER-005-2 R4 is the implementation of simulation technology to train on IROLs if the entity meets criteria "(1) and (2)" of R4, NOT to train on "system restoration".

PER-005-2 R4 does not address the "annual" training on system restoration. System restoration may have to be performed as the result of an IROL, but system restoration training is different than training on IROLs. Also, an entity may use simulation technology as part of their training program to train on system

restoration, but it is not required in EOP-005-2 R10.

Response:

The EOP PRT does not find that there is adequate justification providing annual system restoration training for System Operators in another standard. Therefore, the EOP PRT recommends that the future SDT evaluate moving R10 into the PER family of standardcommends that the future SDT evaluate moving R10 into PER-005; and if unable, Requirement R10 will be maintained in EOP-005.

Likes:

0

Dislikes:

0

Ben Li - Independent Electricity System Operator - 2 – NPCC

Selected Answer:

Yes

Answer Comment:

We do not agree with the proposal to retire Requirement R10 as we do not believe this requirement is duplicative of any requirements in PER-005-2.

We assess that the Independent Expert Panel's recommendation to retire R10 was based on its assessment that this requirement was duplicative of

R3 of PER-005-1, which stipulates that:

R3. At least every 12 months each Reliability Coordinator, Balancing Authority and Transmission

Operator shall provide each of its System Operators with at least 32 hours of emergency operations training applicable to its organization that reflects emergency operations topics, which includes system restoration using drills, exercises or other training required to maintain qualified personnel.

This recommendation appeared to be appropriate at that time. However, in PER-005-2 (revised from PER-005-1), the requirement to provide system restoration training no longer exists. In fact, the rationale to remove the minimum training requirement specific to system restoration from PER-005-1 was in part based on the existence of Requirement R10 in EOP-005-2 (and R9 in EOP-006-2).

If Requirement R10 in EOP-005 is removed, then there will not be any requirements to provide system restoration training to operating personnel in any standards. We therefore suggest that this requirement be retained.

Response:

The EOP PRT does not find that there is adequate justification providing annual system restoration training for System Operators in another standard. Therefore, the EOP PRT recommends that the future SDT evaluate moving R10 into the PER family of

standard commends that the future SDT evaluate moving R10 into PER-005; and if unable, Requirement R10 will be maintained in EOP-005.

Likes: 0

Dislikes: 0

Sergio Banuelos - Tri-State G and T Association, Inc. - 1,3,5 - MRO,WECC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 – WECC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Leo Staples - OGE Energy - Oklahoma Gas and Electric Co. - 5 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

minh pham - Los Angeles Department of Water and Power - NA - Not Applicable – WECC

Selected Answer: Yes

Answer Comment:

EOP-005-2 R10 requires training to be conducted on the restoration plan, to include many specific items. If PER-005 is accurately followed, a Training Gap Analysis will discover the need to conduct the exact training that is specified in EOP-005-2 R10. This requirement should be deleted in future versions of EOP-005. At a minimum this requirement should be moved to a future PER-005

Reliability Standard in an effort to consolidate **all** of the Real-Time System Operator training requirements into only one standard.

Response:

The EOP PRT does not find that there is adequate justification providing annual system restoration training for System Operators in another standard. Therefore, the EOP PRT recommends that the future SDT evaluate moving R10 into the PER family of standardcommends that the future SDT evaluate moving R10 into PER-005; and if unable, Requirement R10 will be maintained in EOP-005.

Likes:

0

Dislikes:

0

Terri Pyle - OGE Energy - Oklahoma Gas and Electric Co. - 1 -

Selected Answer:

Answer Comment:

Response:

Likes:

0

Dislikes:

0

Brad Ryan - Berkshire Hathaway - PacifiCorp - 6 – WECC**Selected Answer:** Yes**Answer Comment:****Response:****Likes:** 0**Dislikes:** 0

Joshua Andersen - Salt River Project - 1,3,5,6 – WECC**Selected Answer:** No**Answer Comment:**

PER-005-2 does not call for the training on blackstart procedures. Only if identified by the entity as a reliability related task would the system operators receive training. Additionally, removal of this requirement would create a gap with DPs that are part of a TOP restoration plan as PER-005-2 is not applicable to the DP registration.

Response:

The EOP PRT does not find that there is adequate justification providing annual system restoration training for System Operators in another standard. Therefore, the EOP PRT recommends that the future SDT evaluate moving R10 into the PER family of standardcommends that the future SDT evaluate moving R10 into

PER-005; and if unable, Requirement R10 will be maintained in EOP-005.

Likes: 0

Dislikes: 0

Daniela Hammons - CenterPoint Energy Houston Electric, LLC - 1 – TRE

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

3. The EOP PRT is proposing not to retire three (3) requirements in EOP-005-2 per the Paragraph 81 criteria and has provided justification for not retiring the requirements that the IERP recommended retiring. Do you agree with the EOP PRT's recommendations? If not, please explain.

Summary:

The EOP PRT recommends that the future SDT incorporate into Requirement R1 “develop, maintain, and implement” and review Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard. The EOP PRT maintains that Requirement R12 will not be retired because it is not viewed as training.

The EOP PRT does not find that there is adequate justification providing annual system restoration training for System Operators in another standard. Therefore, the EOP PRT recommends that the future SDT evaluate moving R10 into the PER family of standard commends that the future SDT evaluate moving R10 into PER-005; and if unable, Requirement R10 will be maintained in EOP-005.

In the revisions of EOP-005 the EOP PRT will recommend alternate wording in Requirement R1 to capture comments received provided they do not change the intent of Requirement R1.

The EOP PRT considered the recommendations of the IERP when reviewing the requirements for retirement.

The EOP PRT maintains that Requirement R12 will not be retired because it is not viewed as training. The IERP determined Requirement R12 to be duplicative with PER-005-1 Requirement R3. The EOP PRT does not recommend retirement of EOP-005-2 Requirement R12. Requirement R12 is not a training requirement, it is a testing requirement (“drill, exercise, or simulation”), which determines the necessity for personnel training under PER-005-1 Requirement R3.

The EOP PRT, not being aware of any issues involved with Requirement R11, does not believe Requirement R11 needs to be changed.

The EOP PRT will recommend that the future SDT review options for clarification steady state and dynamic simulations. The EOP PRT will recommend that the future drafting team review the proposed rationale box and provide details and clarifications regarding the performance of steady state and dynamic simulations.

Dennis Minton - Florida Keys Electric Cooperative Assoc. - 1 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

John Fontenot - Bryan Texas Utilities - 1 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Leonard Kula - Independent Electricity System Operator - 2 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Si Truc Phan - Hydro-Qu?bec TransEnergie - 1 – NPCC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Emily Rousseau - MRO - 1,2,3,4,5,6 – MRO

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Kaleb Brimhall - Colorado Springs Utilities - 5 -

Selected Answer: No

Answer Comment: CSU agrees with the recommendations of the IERP for retirement of these requirements. These requirements need to be retired.

Response: The EOP PRT recommends that the future SDT incorporate into Requirement R1 “develop, maintain, and implement” and review Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard. The EOP PRT maintains that Requirement R12 will not be retired because it is not viewed as training.

Likes: 0

Dislikes: 0

Maryclaire Yatsko - Seminole Electric Cooperative, Inc. - 1,3,4,5,6 – FRCC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Connie Lowe - Dominion - Dominion Resources, Inc. - 3 -

Selected Answer: No

Answer Comment:

R7 calls for implementing the restoration plan when "...in which one or more areas of the BES shuts down and the use of Blackstart Resources is required...". If the disturbance does not result in one or more areas of the BES shutting down or use of Blackstart Resources there is no expectation that the TOP implement its restoration plan.

R8 – Dominion does not agree with EOP PRT’s recommendation to retain R8. R8 requires the TOP synchronize with neighboring TOP areas "...or in accordance with the **established procedures of the Reliability Coordinator**"... R1.3 requires the TOP’s restoration plan **include Procedures for restoring**

interconnections with other Transmission Operators ***under the direction of the Reliability Coordinator.***
 There is no improvement to reliability gained by having the TOP bear compliance burden for both, R1.3 and R8. R8 is inferred to be incorporated in R1.3.

Response:

The EOP PRT recommends that the future SDT incorporate into Requirement R1 “develop, maintain, and implement” and review Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard. The EOP PRT maintains that Requirement R12 will not be retired because it is not viewed as training.

Likes:

0

Dislikes:

0

Thomas Foltz - AEP - 5 -

Selected Answer:

Yes

Answer Comment:

Response:

Likes:

0

Dislikes:

0

0

Brian Bartos - CPS Energy - 3 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Erika Doot - U.S. Bureau of Reclamation - 5 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Joel Wise - Tennessee Valley Authority - 1,3,5,6 – SERC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Nick Vtyurin - Manitoba Hydro - 1,3,5,6 – MRO

Selected Answer: No

Answer Comment:

I agree with the *IERP* recommendations and reasons except the one for R12. R12 can stay.

Response:

The EOP PRT recommends that the future SDT incorporate into Requirement R1 “develop, maintain, and implement” and review Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard. The EOP PRT maintains that Requirement R12 will not be retired because it is not viewed as training.

Likes: 0

Dislikes: 0

christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Andrew Puztai - American Transmission Company, LLC - 1 -

Selected Answer: No

Answer Comment:

- • ATC supports the Periodic Review Team's recommendation to retire Requirements # 10 and all associated Sub-Requirements.

The Periodic Review Team does not endorse the recommendations of the Independent Expert Review Project (IERP) to retire Recommendations # 7, 8, and 12. ATC believes the judgment of the IERP is prudent and, as such, ATC does supports the retirement of Requirements # 7, 8, and 12.

- Requirement # 7 simply requires the “implementation” of the Registered Entity’s “restoration plan” following a Disturbance in which one or more areas of the BES shuts down and the use of Blackstart Resources is required. ATC agrees with the IERP that implementation of the restoration plan is a logical action that is defined in each Registered Entity’s restoration plan that does not require a stand-alone requirement.
 - ATC believes that Requirements # 8 should be retired, as recommended by the IERP since it is redundant with R1.3. R1.3 requires a Transmission Owner to have a restoration plan with accompanying procedures approved by the Reliability Coordinator for restoring interconnections with other Transmission Operators under the direction the Reliability Coordinator. ATC believes Requirement # 8 essentially requires the same obligations as defined in R1.3 and, as such, Requirement # 8 should be retired.
 - ATC believes Requirement # 12 should be retired, as recommended by the IERP. Requirement # 12 is not about testing the plan but drilling the personnel on execution of the plan. Therefore, it is ATC’s opinion that Requirement # 12 is a training requirements which is accommodated by Reliability Standard PER-005.

Response:

The EOP PRT does not find that there is adequate justification providing annual system restoration training for System Operators in another standard. Therefore, the EOP PRT recommends that the future SDT evaluate moving R10 into the PER family of standardcommends that the future SDT evaluate moving R10 into PER-005; and if unable, Requirement R10 will be maintained in EOP-005.

Likes: 0

Dislikes: 0

Lee Pedowicz - Northeast Power Coordinating Council - 10 – NPCC

Selected Answer: No

Answer Comment:

Recommend that Requirements R7 and R8 be incorporated into Requirement R1. Agree that the already approved industry terminology “develop, maintain and implement” should be incorporated into EOP-005-2. By adding that terminology in Requirement R1, the language of Requirements R7 and R8 can be moved to Requirement R1. This is consistent with the structure of other reliability standards [e.g., EOP-001-2.1b R2 (and future successor EOP-011-1, Requirements R1 and R2), EOP-010-1 Requirements R1 and R3, and TOP-004-2 Requirement R6]. Therefore, recommend retiring Requirements R7 and R8, and moving the language of Requirements R7 and R8 into Requirement R1. Requirement R1 should be revised as follows:

- The first sentence in Requirement R1 should be revised to state: "Each Transmission Operator shall develop, maintain and implement a restoration plan that is approved by its Reliability Coordinator."
- Part R1.3 should be revised to state: "Procedures for restoring interconnections with other Transmission Operators with authorization from and under the

direction of the Reliability Coordinator."

- A new part should be added to R1 (best placed as Part R1.9, with the currently effective Part R1.9 renumbered to become Part 1.10). The new part should state: "Restoration strategies to facilitate restoration if the restoration plan cannot be executed as expected."

Response:

The EOP PRT recommends that the future SDT incorporate into Requirement R1 "develop, maintain, and implement" and review Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard. The EOP PRT maintains that Requirement R12 will not be retired because it is not viewed as training.

In the revisions of EOP-005 the EOP PRT will recommend alternate wording in Requirement R1 to capture comments received provided they do not change the intent of Requirement R1.

Likes:

0

Dislikes:

0

Molly Devine - IDACORP - Idaho Power Company - 1 -

Selected Answer:

Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

John Seelke - Public Service Enterprise Group - 1,3,5,6 - NPCC,RFC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Mark Kenny - Northeast Utilities - 3 -

Selected Answer: No

Answer Comment:

Recommend that Requirements R7 and R8 be incorporated into Requirement R1. Agree that the already-approved industry terminology “develop, maintain and implement” should be incorporated into EOP-005-2. By

adding that terminology in Requirement R1, the language of Requirements R7 and R8 can be moved to Requirement R1. This is consistent with the structure of other reliability standards [e.g., EOP-001-2.1b R2 (and future successor EOP-011-1, Requirements R1 and R2), EOP-010-1 Requirements R1 and R3, and TOP-004-2 Requirement R6]. Therefore, recommend retiring Requirements R7 and R8, and moving the language of Requirements R7 and R8 into Requirement R1. Requirement R1 should be revised as follows:

- The first sentence in Requirement R1 should be revised to state: "Each Transmission Operator shall develop, maintain and implement a restoration plan that is approved by its Reliability Coordinator."
- Part R1.3 should be revised to state: "Procedures for restoring interconnections with other Transmission Operators with authorization from and under the direction of the Reliability Coordinator."
- A new part should be added to R1 (best placed as Part R1.9, with the currently effective Part R1.9 renumbered to become Part 1.10). The new part should state: "Restoration strategies to facilitate restoration if the restoration plan cannot be executed as expected."

Response:

The EOP PRT recommends that the future SDT incorporate into Requirement R1 "develop, maintain, and implement" and review Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard. The EOP PRT maintains that Requirement R12 will not be retired because it is not viewed as training.

In the revisions of EOP-005 the EOP PRT will recommend alternate wording in Requirement R1 to capture comments received provided they do not change the intent of Requirement R1.

Likes: 0

Dislikes: 0

Matthew Beilfuss - Wisconsin Energy Corporation - 3,4,5 – RFC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Ben Engelby - ACES Power Marketing - 6 -

Selected Answer: No

Answer Comment:

(1) If there are requirements in a standard that meet

Paragraph 81 criteria, which is supported by the Independent Expert Review Panel, the PRT should seriously consider retiring the applicable requirements. Is the PRT saying that the IERP recommendation to retire the requirements was made without merit?

(2) Requirements R1.3 and R8 are redundant and we recommend the redundancy be removed. Requirement R1.3 compels the plan to require RC approval prior to resynchronization and to adhere to that during implementation. Requirement R8 is the implementation requirement that compels the same thing as R1.3.

(3) We disagree with the two-hour training requirement in R11. It should be defined in terms of what the training must cover, rather than prescribe any amount of time. It's isn't the amount of time that matters; it's whether the appropriate information is conveyed and understood.

(4) We do not understand how R12 can be viewed as a testing requirement. R12 is clearly a training requirement and R6 is clearly a testing requirement. R6 is intended to test the capability of the plan to make sure it works accordingly. R12 is intended to ensure that the TOP System Operators are capable of carrying out its plan in coordination with the RC by exercising their capabilities, which is duplicative with PER-005-1 R3 since it deals with training during system restoration using drills and exercises.

(5) The Requirement R6 recommendation needs to clarify the timeframe of the dynamic study to determine if additional studies are needed. We have concerns with the drafting team recommendation to significantly extend the burden of the dynamic analyses related to R6. The drafting team wording suggests a dynamic study time extension beyond the transient time period studies of 15 – 25 seconds to a midterm type study which may require an additional mid-term study package. We suggest that the

drafting team clarify its position on whether it needs more time than the typical dynamic study timeframe or whether the drafting team was referring to additional studies rather than the time length in seconds of the dynamic studies. The drafting team also appears to be asking for a dynamic study after every load and generation addition which significantly multiplies the number of dynamic studies required. We suggest the drafting team consider a reliability criteria to distinguish between verifying the ability for the black start plan to perform correctly and the addition of unnecessary dynamic studies. NERC requirements such as EOP-005-2 R13 are written for separately registered NERC functions. We request that the drafting team clarify if an entity is registered for more than one NERC registration in a requirement that it is unnecessary to have “internal agreements” within the registered entity. To require this is duplicative and unnecessarily burdensome, which would meet Paragraph 81 criteria.

Response:

The EOP PRT considered the recommendations of the IERP when reviewing the requirements for retirement.

The EOP PRT recommends that the future SDT incorporate into Requirement R1 “develop, maintain, and implement” and review Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard.

The EOP PRT maintains that Requirement R12 will not be retired because it is not viewed as training. The IERP determined Requirement R12 to be duplicative with PER-005-1 Requirement R3. The EOP PRT does not recommend retirement of EOP-005-2 Requirement R12. Requirement R12 is not a training requirement, it is a testing requirement (“drill, exercise, or simulation”), which

determines the necessity for personnel training under PER-005-1 Requirement R3.

The EOP PRT, not being aware of any issues involved with Requirement R11, does not believe Requirement R11 needs to be changed.

The EOP PRT will recommend that the future SDT review options for clarification steady state and dynamic simulations. The EOP PRT will recommend that the future drafting team review the proposed rationale box and provide details and clarifications regarding the performance of steady state and dynamic simulations.

Likes: 0

Dislikes: 0

Kathleen Black - DTE Energy - 3,4,5 – RFC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Paul Malozewski - Hydro One Networks, Inc. - 3 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Payam Farahbakhsh - Hydro One Networks, Inc. - 1 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Joseph Bencomo - PPL NERC Registered Affiliates - 1,3,5,6 - MRO,WECC,NPCC,SERC,SPP,RFC

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Jason Smith - Southwest Power Pool, Inc. (RTO) - 2 – SPP

Selected Answer: No

Answer Comment:

We disagree with the PRT's interpretation that R12 is a testing requirement. If the PRT feels R12 is a testing requirement, then the PRT should suggest a revision making this clear. R16 contains testing requirements and appropriate language. The use of the phrase "drill, exercise, or simulation" in R12 supports the intent of "training" based on the Webster's definition of "drill". Also, operators who participate in drills conducted by the RC typically are awarded Continuing Education Hours

associated with an approved ILA. This also leads us to the conclusion that this participation is more training in nature. We believe there is also some testing of processes and procedures that occurs, but we disagree that the intent of the requirement is to test. We recommend the PRT review this conclusion. R12 is not clearly either a training or testing requirement. If the intent is for testing, then we recommend the language in R12 be clarified to include what the intent of the testing shall include and if documentation of the test results is required. If the intent is to ensure TOPs participate in activities designed to ensure familiarity and consistency of execution of the plan, then we believe R12 should be retired as it is redundant with PER-005-1 R3.

Response:

The IERP determined Requirement R12 to be duplicative with PER-005-1 Requirement R3. The EOP PRT does not recommend retirement of EOP-005-2 Requirement R12. Requirement R12 is not a training requirement, it is a testing requirement (“drill, exercise, or simulation”), which determines the necessity for personnel training under PER-005-1 Requirement R3.

Likes:

1 OGE Energy - Oklahoma Gas and Electric Co., 1, Pyle Terri

Dislikes:

0

Jared Shakespeare - Peak Reliability - 1 -

Selected Answer:

Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Rachel Coyne - Texas Reliability Entity, Inc. - 10 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 – SERC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Ben Li - Independent Electricity System Operator - 2 – NPCC

Selected Answer: No

Answer Comment:

We recommend that Requirements R7 and R8 be incorporated into Requirement R1. We agree that the already-approved industry terminology “develop, maintain and implement” should be incorporated into EOP-005-2. By adding that terminology in Requirement R1, the language of Requirements R7 and R8 can be moved to Requirement R1. This is consistent with the structure of other reliability standards [e.g., EOP-001-2.1b R2 (and future successor EOP-011-1, Requirements R1 and R2), EOP-010-1 Requirements R1 and R3, and TOP-004-2 Requirement R6]. Therefore, we recommends retiring Requirements R7 and R8, and moving the language of Requirements R7 and R8 into Requirement R1. Specifically, Requirement R1 should be revised as follows:

- The first sentence in Requirement R1 should be revised to state: "Each Transmission Operator shall develop, maintain and implement a restoration plan

that is approved by its Reliability Coordinator.”

- Part R1.3 should be revised to state: "Procedures for restoring interconnections with other Transmission Operators with authorization from and under the direction of the Reliability Coordinator."

A new part should be added to R1 (best placed as Part R1.9, with the currently effective Part R1.9 renumbered to become Part 1.10). The new part should state: "Restoration strategies to facilitate restoration if the restoration plan cannot be executed as expected."

Response:

The EOP PRT recommends that the future SDT incorporate into Requirement R1 “develop, maintain, and implement” and review Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard.

In the revisions of EOP-005 the EOP PRT will recommend alternate wording in Requirement R1 to capture comments received provided they do not change the intent of Requirement R1.

Likes:

0

Dislikes:

0

Sergio Banuelos - Tri-State G and T Association, Inc. - 1,3,5 - MRO,WECC

Selected Answer:

No

Answer Comment:

Tri-State agrees with the recommendations for requirements R7 and R12. We also agree that R8 is not duplicative but we're not clear on how the recommendations are meant to improve R8. It seems they are recommending similar language for R8 as the language suggested for R7 but there isn't much to "develop, maintain and implement" since it is just a small part of the plan.

Response:

The EOP PRT recommends that the future SDT incorporate into Requirement R1 "develop, maintain, and implement" and review Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard. The EOP PRT maintains that Requirement R12 will not be retired because it is not viewed as training.

Likes:

0

Dislikes:

0

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 – WECC**Selected Answer:**

Yes

Answer Comment:

BPA believes the first bullet for the R7 recommendation is not clear: current language does use the word "implement" and this meets the requirement of an action verb. No change to R7 is required.

Response:

The EOP PRT recommends that the future SDT incorporate into Requirement R1 “develop, maintain, and implement” and review Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard.

Likes:

0

Dislikes:

0

Leo Staples - OGE Energy - Oklahoma Gas and Electric Co. - 5 -

Selected Answer:

Answer Comment:

Response:

Likes:

0

Dislikes:

0

minh pham - Los Angeles Department of Water and Power - NA - Not Applicable - WECC

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Terri Pyle - OGE Energy - Oklahoma Gas and Electric Co. - 1 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Brad Ryan - Berkshire Hathaway - PacifiCorp - 6 – WECC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Joshua Andersen - Salt River Project - 1,3,5,6 – WECC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Daniela Hammons - CenterPoint Energy Houston Electric, LLC - 1 - TRE

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes:

0

4. Do you agree with the initial recommendation of the EOP PRT regarding EOP-005-2? If not, please explain specifically what aspects of the recommendation you disagree with.

Summary:

The EOP PRT does not find that there is adequate justification providing annual system restoration training for System Operators in another standard. Therefore, the EOP PRT recommends that the future SDT evaluate moving R10 into the PER family of standards; and if unable, Requirement R10 will be maintained in EOP-005.

The EOP PRT considered the recommendations of the IERP when reviewing the requirements for retirement.

The EOP PRT will recommend that the future SDT review options for clarification of unique tasks, including the possibility of an addition of a rationale box.

The EOP PRT recommends that the future SDT incorporate into Requirement R1 “develop, maintain, and implement” and review Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard.

The EOP PRT maintains the recommendation that the future SDT review the use of the terms “plans” and “procedures” used throughout the standard for consistency.

The EOP PRT will recommend that the future SDT review options for clarification steady state and dynamic simulations. The EOP PRT will recommend that the future drafting team review the proposed rationale box and provide details and clarifications regarding the performance of steady state and dynamic simulations.

The EOP PRT recommends that the future SDT incorporate into Requirement R1 “develop, maintain, and implement” and review Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard. The EOP PRT recognizes that strategies are system and company specific and should be left up to the TOP when developing their restoration plan.

Dennis Minton - Florida Keys Electric Cooperative Assoc. - 1 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

John Fontenot - Bryan Texas Utilities - 1 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Leonard Kula - Independent Electricity System Operator - 2 -

Selected Answer:

Yes

Answer Comment:

We generally agree with the proposed revisions except the proposed retirement of Requirement R10 as noted under Q2, above.

Response:

The EOP PRT does not find that there is adequate justification providing annual system restoration training for System Operators in another standard. Therefore, the EOP PRT recommends that the future SDT evaluate moving R10 into the PER family of standard commends that the future SDT evaluate moving R10 into PER-005; and if unable, Requirement R10 will be maintained in EOP-005.

Likes:

0

Dislikes:

0

Si Truc Phan - Hydro-Quebec TransEnergie - 1 – NPCC
Selected Answer:

Yes

Answer Comment:**Response:****Likes:**

0

Dislikes: 0

Emily Rousseau - MRO - 1,2,3,4,5,6 – MRO

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Kaleb Brimhall - Colorado Springs Utilities - 5 -

Selected Answer: No

Answer Comment:

CSU agrees with the recommendations of the IERP for retirement of requirements. All requirements that the IERP recommended retiring need to be retired.

Response:

The EOP PRT considered the recommendations of the IERP when reviewing the requirements for retirement.

Likes:

0

Dislikes:

0

Maryclaire Yatsko - Seminole Electric Cooperative, Inc. - 1,3,4,5,6 - FRCC

Selected Answer:

Yes

Answer Comment:

Response:

Likes:

0

Dislikes:

0

Connie Lowe - Dominion - Dominion Resources, Inc. - 3 -

Selected Answer:

Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Thomas Foltz - AEP - 5 -

Selected Answer: No

Answer Comment:

As stated in our response to question #2, R10 should not be retired unless the training of plant operators is included in PER-005-2.

Response:

Thank you for your comment. Requirement R10 is not applicable to plant operators.

Likes: 0

Dislikes: 0

Brian Bartos - CPS Energy - 3 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Erika Doot - U.S. Bureau of Reclamation - 5 -

Selected Answer: No

Answer Comment:

Reclamation disagrees with the PRT's assertion that there is no industry confusion associated with the term "unique tasks" in R11. Reclamation agrees with the comments submitted by the American Public Power Association, Edison Electric Institute, and Bonneville Power Administration during Federal Energy Regulatory Commission review of EOP-005-2. R11 requires TOPs, as well as Transmission Owners and Distribution Providers, to provide a minimum of two hours of System restoration training every two calendar years to their field switching personnel identified as performing unique tasks associated with the Transmission Operator's restoration plan that are outside of their normal tasks. Reclamation recommends that this training requirement be eliminated as encompassed within PER-005-2. In the alternative, Reclamation recommends that the PRT update its recommendation and the future standards drafting team provide examples of "unique tasks" associated with

restoration that may be outside of normal transmission switching tasks for clarification.

Response:

The EOP PRT will recommend that the future SDT review options for clarification of unique tasks, including the possibility of an addition of a rationale box.

Likes:

0

Dislikes:

0

Joel Wise - Tennessee Valley Authority - 1,3,5,6 – SERC

Selected Answer:

No

Answer Comment:

No based on answer to questions 2.

Response:

Likes:

0

Dislikes:

0

Nick Vtyurin - Manitoba Hydro - 1,3,5,6 – MRO

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -

Selected Answer: No

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Andrew Pusztai - American Transmission Company, LLC - 1 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Lee Pedowicz - Northeast Power Coordinating Council - 10 – NPCC

Selected Answer: No

Answer Comment:

(i) Please see comments in the response to Question 3 regarding the retirement of Requirements R7 and R8, and incorporation of their language into Requirement R1. Once this is done, the EOP PRT's recommendations under 2.f. and 2.g. become moot.

(ii) The terms "plans" and "procedures" are appropriately used throughout the standard and, therefore, no revisions to those terms are needed.

(ii) The second sentence in the EOP PRT's recommendation under 2.e. should be revised to conform to the first sentence, by adding the word "clarified:" "In addition, the EOP PRT recommends that the future SDT verify that the RSAW is appropriate to capture the clarified intent of the requirement."

Response:

The EOP PRT recommends that the future SDT incorporate into Requirement R1 “develop, maintain, and implement” and review Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard.

The EOP PRT discussed your comment, but the EOP PRT maintains the recommendation that the future SDT review the use of the terms “plans” and “procedures” used throughout the standard for consistency.

Likes:

0

Dislikes:

0

Molly Devine - IDACORP - Idaho Power Company - 1 -**Selected Answer:**

Yes

Answer Comment:**Response:****Likes:**

0

Dislikes: 0

John Seelke - Public Service Enterprise Group - 1,3,5,6 - NPCC,RFC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Mark Kenny - Northeast Utilities - 3 -

Selected Answer: No

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Matthew Beilfuss - Wisconsin Energy Corporation - 3,4,5 - RFC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Ben Engelby - ACES Power Marketing - 6 -

Selected Answer: Yes

Answer Comment:

(1) We agree with the initial recommendation that EOP-005-2 should be revised.

Response: Thank you for your support.

Likes: 0

Dislikes: 0

Kathleen Black - DTE Energy - 3,4,5 – RFC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Paul Malozewski - Hydro One Networks, Inc. - 3 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Payam Farahbakhsh - Hydro One Networks, Inc. - 1 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Joseph Bencomo - PPL NERC Registered Affiliates - 1,3,5,6 - MRO,WECC,NPCC,SERC,SPP,RFC

Selected Answer: No

Answer Comment: See the comments above.

Response:

Likes: 0

Dislikes: 0

Jason Smith - Southwest Power Pool, Inc. (RTO) - 2 – SPP

Selected Answer: No

Answer Comment:

See comments above regarding R12.

We agree with the intended clarification on “dynamic simulation” in relation to R6. The use of the phrase “dynamic simulation” has led to much confusion amongst the industry and should be addressed. Perhaps once the intended type of simulation has been decided, we suggest submission of a SAR with either a new, defined term or update an existing definition if needed and that definition aligned across the appropriate documents such as Rules of Procedure.

We would like to see further guidance on the intention of what “unique tasks” should be considered for R11. While we agree that there has been little public issue reported regarding this topic of unique tasks, we feel there is little consistency among TOPs, TOs, and DPs in their interpretation. This ranges from no unique tasks identified in one TOP area while a neighbor TOP for a system of similar size and configuration may identify several tasks that are unique. We believe there is inconsistency in application of the intent of the R11 requirement. We also suggest removing the specific two hour requirement regarding the training. We suggest instead to include the

phrase “adequate training” instead. Since some entities unique tasks are perhaps minor, two hours of training may be excessive. Also, the requirement language should be clarified to ensure the training that is required is actually relevant to the unique task. This issue is also in R17 regarding the GOP’s required training. The requirement is unclear in what the training must include. We also ask for removal of the two hour requirement in R17 and perhaps replace with the phrase “adequate training”.

In R7, we request that the PRT review this requirement for clarity regarding the intent. The intent of the “strategies” is unclear. Specifically we ask for direction in what constitutes the expected strategies the Standard expects a TOP to have. We do not suggest the requirement specifically dictate required details of the strategies. Perhaps some guidance can be put into the Guidelines section of the Standard providing a brief discussion of what types of activities would be beneficial to include in the strategy as documented in the plan.

Response:

The EOP PRT will recommend that the future SDT review options for clarification steady state and dynamic simulations. The EOP PRT will recommend that the future drafting team review the proposed rationale box and provide details and clarifications regarding the performance of steady state and dynamic simulations.

The EOP PRT will recommend that the future SDT review options for clarification of unique tasks, including the possibility of an addition of a rationale box.

The EOP PRT recommends that the future SDT incorporate into Requirement R1 “develop, maintain, and implement” and review

Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard. The EOP PRT recognizes that strategies are system and company specific and should be left up to the TOP when developing their restoration plan.

Likes:	1	OGE Energy - Oklahoma Gas and Electric Co., 1, Pyle Terri
Dislikes:	0	

Jared Shakespeare - Peak Reliability - 1 -

Selected Answer:

Answer Comment:

Response:

Likes:	0
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Dislikes:	0
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Rachel Coyne - Texas Reliability Entity, Inc. - 10 -

Selected Answer:	No
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Answer Comment:	Texas RE does not agree with the retirement of
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Requirement R10.

Response:

The EOP PRT does not find that there is adequate justification providing annual system restoration training for System Operators in another standard. Therefore, the EOP PRT recommends that the future SDT evaluate moving R10 into the PER family of standards; and if unable, Requirement R10 will be maintained in EOP-005.

Likes:

0

Dislikes:

0

RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 – SERC

Selected Answer:

No

Answer Comment:

No, based on answer to question #2

Response:

Likes:

0

Dislikes:

0

Ben Li - Independent Electricity System Operator - 2 – NPCC

Selected Answer:

Yes

Answer Comment:

We generally agree with the proposed revisions except the proposed retirement of Requirement R10 as noted under Q2, above.

In addition:

(i) Please see comments above, regarding the retirement of Requirements R7 and R8, and incorporation of their language into Requirement R1. Once this is done, the EOP PRT's recommendations under 2.f. and 2.g. become moot.

(ii) We believe that the terms "plans" and "procedures" are appropriately used throughout the standard and, therefore, no revisions to those terms are needed.

(iii) The second sentence in the EOP PRT's recommendation under 2.e. should be revised to conform to the first sentence, by adding the word "clarified:" "In addition, the EOP PRT recommends that the future SDT verify that the RSAW is appropriate to capture the clarified intent of the requirement."

Response:

The EOP PRT does not find that there is adequate justification providing annual system restoration training for System Operators in another standard. Therefore, the EOP PRT recommends that the future SDT evaluate moving R10 into the PER family of standards; and if unable, Requirement R10 will be maintained in EOP-005.

The EOP PRT recommends that the future SDT incorporate into Requirement R1 “develop, maintain, and implement” and review Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard.

The EOP PRT recommends that the future SDT review the use of the terms “plans” and “procedures” used throughout the standard for consistency.

Thank you for your comment. The EOP PRT’s intention in capturing the intent of the requirement in the RSAW would be the clarified intent.

Likes:

0

Dislikes:

0

Sergio Banuelos - Tri-State G and T Association, Inc. - 1,3,5 - MRO,WECC**Selected Answer:**

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Selected Answer: Yes

Answer Comment:

Please change to wording of the question to clearly indicate the framework of the question is the initial recommendation **decision** regarding reaffirm/revise/retire of a Standard.

Response:

Likes: 0

Dislikes: 0

Leo Staples - OGE Energy - Oklahoma Gas and Electric Co. - 5 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

minh pham - Los Angeles Department of Water and Power - NA - Not Applicable - WECC

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Terri Pyle - OGE Energy - Oklahoma Gas and Electric Co. - 1 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Brad Ryan - Berkshire Hathaway - PacifiCorp - 6 – WECC

Selected Answer: No

Answer Comment:

PacifiCorp has concerns with the drafting team recommendation to significantly extend the burden of the dynamic analyses related to R6. It appears that the drafting team wants studies that extend beyond the transient time period studies of 15 – 25 seconds to a midterm type study which may require an additional midterm study package. PacifiCorp suggests that the drafting team clarify its position on whether it needs more time than the typical dynamic study timeframe (find this value out from PTI) or whether the drafting team was referring to additional studies rather than the time length in seconds of the dynamic studies.

The drafting team also appears to be asking for a dynamic study after every load and generation addition which significantly multiplies the number of dynamic studies required. PacifiCorp suggests the drafting team consider a reliability criteria to distinguish between verifying the ability for the black start to perform correctly and the addition of unnecessary dynamic studies.

Response:

The EOP PRT will recommend that the future SDT review options for clarification steady state and dynamic simulations. The EOP PRT will recommend that the future drafting team review the proposed rationale box and provide details and clarifications regarding the performance of steady state and dynamic simulations.

Likes:

0

Dislikes:

0

Joshua Andersen - Salt River Project - 1,3,5,6 – WECC

Selected Answer:

Yes

Answer Comment:

Response:

Likes:

0

Dislikes:

0

Daniela Hammons - CenterPoint Energy Houston Electric, LLC - 1 – TRE

Selected Answer:

Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

5. If you have any other comments that you have not already mentioned above, on the Periodic Review recommendation, please state it specifically for EOP-005-2.

Summary:

The EOP PRT reviewed and determined that there are no additional terms that need to be defined. Blackstart Resources is a defined term in the NERC Glossary of Terms.

The EOP PRT will recommend that the future SDT review options for clarification of unique tasks, including the possibility of an addition of a rationale box.

The EOP PRT will recommend that the future SDT review options for clarification steady state and dynamic simulations. The EOP PRT will recommend that the future drafting team review the proposed rationale box and provide details and clarifications regarding the performance of steady state and dynamic simulations.

The EOP PRT recommends that the future SDT incorporate into Requirement R1 “develop, maintain, and implement” and review Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard. The EOP PRT recognizes that strategies are system and company specific and should be left up to the TOP when developing their restoration plan.

The EOP PRT recommends Requirement R4 be reviewed for clarity regarding the application of when the 90 calendar days applies and update the associated Measure, if applicable.

The EOP PRT is recommending that the future SDT review the evidence retention periods to ensure they align with revisions to the standard.

Dennis Minton - Florida Keys Electric Cooperative Assoc. - 1 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

John Fontenot - Bryan Texas Utilities - 1 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Leonard Kula - Independent Electricity System Operator - 2 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Si Truc Phan - Hydro-Qu?bec TransEnergie - 1 - NPCC

Selected Answer:

Answer Comment:

This standard puts a lot of emphasis on Blackstart Resources but there are no requirements for other critical components such as synchronizing devices, for example:

- Identify the synchronisation points used for system restoration
- Require a fully operational synchronisation device for each synchronisation point
- Require regular maintenance of the synchronisation

devices

- Require synchronisation drills or exercises

R1: There is no reference to the formation of an island on the BES in the context of the TOP restoration plan which seems to be incoherent with R1 of EOP-006-2.

R1.4: There are no clearly defined criteria for the identification of Black Start Resources. In the Directory D8 from NPCC (NPCC D8), a Blackstart Resource is used to restore a clearly identified “minimum basic power system”. In this standard the resource must just be part of the TOP restoration plan (NERC definition).

R1.4: The term “megavar capacity” is not defined (not a NPCC or NERC term).

R6.1: The term “dynamic capability” is not defined (not a NPCC or NERC term).

HQT changed to Active & Reactive power maximum capability instead. Same philosophy as D1, D2,D5,D8 on Capacity and D9 on Operating Capability.

R7 and R8: The implementation of the TOP restoration plan is based on the use of Blackstart Resource to instigate the restoration and there is no reference to the formation of an island on the BES (R1 of EOP-006-2) for invoking the TOP restoration plan.

R11: The term “field switching personnel” needs to be clarified. Most switching operations are nowadays performed by remote control (e.g. a TO control centre) so “field” can refer to personnel in a “lower level” remote control facility and not uniquely a roving operator in the field or an operator manning an installation?

There seems to be a consensus regarding the “unique tasks” (e.g, synchronisation of islands, emergency switching operations such as “open all breakers”) so it would be appropriate to define these unique tasks or list typical examples.

R15: There is an incoherence between the 24 hour delay cited here and the 15 minute delay cited in the NPCC D8 (section 5.7.1.2) for the loss of a critical component (Blackstart Resource). In the NPCC D8 the delay of 24 hours is for loss of redundancy of a critical component. A 24 hour delay for the loss of a critical component seems to be too long.

Response:

The EOP PRT recognizes that strategies are system and company specific and should be left up to the TOP when developing their restoration plan.

The EOP PRT reviewed and determined that there are no additional terms that need to be defined. Blackstart Resources is a defined term in the NERC Glossary of Terms.

The EOP PRT will recommend that the future SDT review options for clarification of unique tasks, including the possibility of an addition of a rationale box.

Likes:

0

Dislikes:

0

Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO

Selected Answer:**Answer Comment:**

The NSRF agrees with the drafting team recommendation to clarify EOP-005-2 R1.4 and what exactly is meant by “type” of unit. Is this the fuel source or make / model?

The NSRF agrees with the drafting team recommendation to clarify that an “electronic or written” plan is available.

The NSRF has concerns with the drafting team recommendation to significantly extend the burden of the dynamic analyses related to R6. The drafting team wording suggests a dynamic study time extension beyond the transient time period studies of 15 – 25 seconds to a midterm type study which may require an additional midterm study package. The NSRF suggests that the drafting team clarify its position on whether it needs more time than the typical dynamic study timeframe or whether the drafting team was referring to additional studies rather than the time length in seconds of the dynamic studies.

The drafting team also appears to be asking for a dynamic study after every load and generation addition which significantly multiplies the number of dynamic studies required. The NSRF suggests the drafting team consider a reliability criteria to distinguish between verifying the

ability for the black start plan to perform correctly and the addition of unnecessary dynamic studies.

The NSRF agrees with the Independent Expert Review that EOP-005-2 R1.3 and R8 are duplicative and can be retired. Alternately, R1.3 can be revised to incorporate R8 with no loss of reliability.

The NSRF agrees with the drafting team recommendation to request clarity on unique tasks (page 6, paragraph 18).

The NSRF agrees with the drafting team recommendation to keep EOP-005-2 R12. EOP-005 R12 is different than the training requirement in PER-005.

The NSRF notes that NERC requirements such as EOP-005-2 R13 are written for separately registered NERC functions. The NSRF requests that the drafting team clarify if an entity is registered for more than one NERC function [vertically integrated] in a requirement that it is unnecessary to have “internal agreements” within the registered entity. To require this is duplicative and unnecessarily burdensome according to Paragraph 81.

The NSRF suggests that EOP-005-2 R7 be clarified with respect to implementing a restoration strategy. The NSRF

recognizes the need for an alternative to strictly following the Restoration Plan explicitly as conditions could be changing rapidly as entities work to restore the grid from a blackout. However, the restoration plan is the strategy or a combination of strategies to systematically restore an entity's system from a blackout. Is the intent of the requirement for TOPs to look for deficiencies in their plans and have strategies for the identified deficiency such as alternative black start paths if the primary black start path was damaged?

The NSRF proposes to modify EOP-005-2 Requirements R11 and R17 which both require two hours of training every two years for field switching personnel performing unique tasks and generator operator responsible for the startup process from blackstart unit, respectively. Industry experience suggests that two hours every two years isn't necessary. Most entities have field personnel and generator operators involved fully or partially in their restoration drills. The specific training that falls under R11 and R17 does not require a timeframe. The NSRF suggests replacing the two hour requirement with "at least every 2 calendar years" similar to the following:

R11. Each Transmission Operator, each applicable Transmission Owner, and each applicable Distribution Provider shall provide a System restoration training every 2 calendar years to their field switching personnel identified as performing unique tasks associated with the Transmission Operator's restoration plan that are outside of their normal tasks.

R17. Each Generator Operator with a Blackstart Resource

*shall provide training **every 2 calendar years** to each of its operating personnel responsible for the startup of its Blackstart Resource generation units and energizing a bus. The training program shall include training on the following: [Violation Risk Factor = Medium] [Time Horizon = Operations Planning]*

R17.1. *System restoration plan including coordination with the Transmission Operator.*

R17.2. *The procedures documented in Requirement R14.*

Response:

Blackstart Resource is a defined term.

The EOP PRT will recommend that the future SDT review options for clarification steady state and dynamic simulations. The EOP PRT will recommend that the future drafting team review the proposed rationale box and provide details and clarifications regarding the performance of steady state and dynamic simulations.

The EOP PRT recommends that the future SDT incorporate into Requirement R1 “develop, maintain, and implement” and review Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard. The EOP PRT recognizes that strategies are system and company specific and should be left up to the TOP when developing their restoration plan.

The EOP PRT reviewed Requirement R11 and Requirement R17 and do not find changes are needed to these requirements.

The EOP PRT will recommend that the future SDT review options for clarification of unique tasks, including the possibility of an addition of a rationale box.

Likes: 0

Dislikes: 0

Kaleb Brimhall - Colorado Springs Utilities - 5 -

Selected Answer:

Answer Comment: No Comments

Response:

Likes: 0

Dislikes: 0

Maryclaire Yatsko - Seminole Electric Cooperative, Inc. - 1,3,4,5,6 - FRCC

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Connie Lowe - Dominion - Dominion Resources, Inc. - 3 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Thomas Foltz - AEP - 5 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Brian Bartos - CPS Energy - 3 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Erika Doot - U.S. Bureau of Reclamation - 5 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Joel Wise - Tennessee Valley Authority - 1,3,5,6 - SERC

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Nick Vtyurin - Manitoba Hydro - 1,3,5,6 - MRO

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Andrew Pusztai - American Transmission Company, LLC - 1 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC

Selected Answer:

Answer Comment:

Support the EOP PRT's recommendation that the future SDT review and address industry confusion regarding the application of "unique tasks." However, clarification is needed (examples should be provided). Without clarification, "unique tasks" could be interpreted differently throughout the industry.

This standard puts a lot of emphasis on Blackstart Resources but there are no requirements for other critical components such as synchronizing devices. For example:

- Identify the synchronization points used for system restoration
- Require a fully operational synchronization device for each synchronization point
- Require regular maintenance of the synchronization devices
- Require synchronization drills or exercises

R1: There is no reference to the formation of an island on the BES in the context of the TOP restoration plan which seems to be inconsistent with R1 of EOP-006-2.

R1.4: There are no clearly defined criteria for the identification of Black Start Resources. In the Directory D8 from NPCC (NPCC D8), a Blackstart Resource is used to restore a clearly identified “minimum basic power system”. In this standard the resource must just be part of the TOP restoration plan (NERC definition).

R1.4: The term “megavar capacity” is not defined.

R6.1: The term “dynamic capability” is not defined. Active and Reactive power maximum capability has been used elsewhere.

R7 and R8: The implementation of the TOP restoration plan is based on the use of Blackstart Resources to initiate the restoration, and there is no reference to the formation of an island on the BES (R1 of EOP-006-2) for invoking the TOP restoration plan.

R11: The term “field switching personnel” needs to be clarified. Most switching operations are currently performed by remote control (e.g. a TO control center) so “field” can refer to personnel in a “lower level” remote control facility and not uniquely a roving operator in the field or an operator manning an installation.

There seems to be a consensus regarding the “unique tasks” (e.g, synchronization of islands, emergency switching operations such as “open all breakers”) so it would be appropriate to define these unique tasks or list typical examples.

Response:

The EOP PRT recognizes that strategies are system and company specific and should be left up to the TOP when developing their restoration plan.

The EOP PRT reviewed and determined that there are no additional terms that need to be defined. Blackstart Resources is a defined term in the NERC Glossary of Terms.

The EOP PRT will recommend that the future SDT review options for clarification of unique tasks, including the possibility of an addition of a rationale box.

Likes:

0

Dislikes:

0

Molly Devine - IDACORP - Idaho Power Company - 1 -

Selected Answer:

Answer Comment:

Response:

Likes:

0

Dislikes:

0

John Seelke - Public Service Enterprise Group - 1,3,5,6 - NPCC,RFC

Selected Answer:

Answer Comment:

PSEG recommends that the team consider rewriting R4 to improve clarity regarding the application of the 90-day period in R4. As written, R4 addresses (in one sentence) two restoration plan update items that a TOP must perform: (1) the restoration plan must be updated within 90 calendar days after identifying any unplanned System modifications are identified, and (2) the restoration plan must be updated prior to implementing a planned BES modification. The phrase “, that would change the implementation of its restoration plan” appears to apply to both types of changes.

There is no time frame specified for updating the restoration plan for a planned BES modification, although one could infer that “90 calendar days” is intended be the same time frame for both unplanned and planned modifications. Furthermore, the distinction between “System modifications” for unplanned changes and “BES modifications” for planned changes is confusing.

PSEG suggests the following rewrite:

R4. Each Transmission Operator shall update its restoration plan to reflect System modifications that would change the implementation of its restoration plan; provided that such changes shall be made within 90 calendar days after the Transmission Operator identifies any unplanned permanent System modifications or within 90 calendar

days prior to the Transmission Operator implementing planned System modifications. *[Violation Risk Factor = Medium] [Time Horizon = Operations Planning]*

R4.1. Each Transmission Operator shall submit its revised restoration plan to its Reliability Coordinator for approval within the same 90 calendar day period.

Response:

The EOP PRT recommends Requirement R4 be reviewed for clarity regarding the application of when the 90 calendar days applies and update the associated Measure, if applicable.

Likes:

0

Dislikes:

0

Mark Kenny - Northeast Utilities - 3 -

Selected Answer:

Answer Comment:

Response:

Likes:

0

Dislikes:

0

Matthew Beilfuss - Wisconsin Energy Corporation - 3,4,5 - RFC**Selected Answer:****Answer Comment:****Response:****Likes:** 0**Dislikes:** 0

Ben Engelby - ACES Power Marketing - 6 -**Selected Answer:****Answer Comment:**

(1) The issue related to the applicability of the standard to a TOP that does not have Blackstart Resources within its TOP Area. The phrase “regardless of whether the Blackstart Resource is located within the TOP’s system...” might infer the TOP’s plan must include restoration activities from specific Blackstart Resources in another system which is not necessary and should be clarified. For example, a small TOP that relies on a larger TOP as a resource for restoration does not need to include that large TOPs Blackstart Resources in its restoration plan. If the TOP restoration plan does not have any Blackstart Resources listed, but does identify which

generators to start, the TOP should have a supplemental plan on how to provide startup power from at least one adjacent TOP to the identified generators.

(2) The PRT should clarify EOP-005-2 R11 and what “unique tasks associated with the TOP’s restoration plan” means and whether field switching personnel should still be required to have a minimum of two hours of system restoration training every two years. This requirement could be retired as it would be covered in the systematic approach to training of PER-005-2.

(3) We disagree with the recommendations to use the phrase “develop, maintain and implement” language for R7 and R8, which are requirements for implementing the development and maintenance requirements that are contained in R1.

(4) Finally, we recommend clarifying EOP-05-2 R18, where each GOP must participate in the RC’s restoration drills, exercises, or simulations, as requested. The issue is whether RC invitations to restoration training are considered requests that trigger compliance concerns for GOPs who may not be an applicable entity to this standard or do not operate a Blackstart Resource.

(5) Thank you for the opportunity to comment.

Response:

The EOP PRT recognizes that strategies are system and company specific and should be left up to the TOP when developing their restoration plan.

The EOP PRT will recommend that the future SDT review options for clarification of unique tasks, including the possibility of an addition of a rationale box.

The EOP PRT recommends that the future SDT incorporate into Requirement R1 “develop, maintain, and implement” and review Requirements R7 and R8 for inclusion into Requirement R1, thus Requirements R7 and R8 would be removed from a future standard.

Likes: 0

Dislikes: 0

Kathleen Black - DTE Energy - 3,4,5 - RFC

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Paul Malozewski - Hydro One Networks, Inc. - 3 -

Selected Answer:

Answer Comment:

Response:

Likes: 1 Hydro One Networks, Inc., 1, Farahbakhsh Payam

Dislikes: 0

Payam Farahbakhsh - Hydro One Networks, Inc. - 1 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Joseph Bencomo - PPL NERC Registered Affiliates - 1,3,5,6 - MRO,WECC,NPCC,SERC,SPP,RFC

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Jason Smith - Southwest Power Pool, Inc. (RTO) - 2 - SPP

Selected Answer:

Answer Comment:

In general, the Standard as written seems to be awkward in dealing with the situation where a TOP who either does not have a Blackstart Resource within their area, or who does not have an ownership stake in the Blackstart Resource. The TOP or GOP cannot be forced to enter into a relationship that makes some of these requirements applicable. How can the TOP have a compliance obligation for equipment that they don't own or control? R9 is an example where the TOP is required to have testing requirements for the Blackstart Resource. R6.1 can also be problematic in testing that the resource meets the desired real and reactive power requirements if the TOP does not own the resource. R13 also forces a TOP and GOP to enter into a contractual agreement if the TOP and GOP are not both a part of the same affiliated company.

It also is not clear when the TOP restoration plan is considered to be in effect. Similar to EOP-006 where the RC plan is clearly outlined as to when it begins and ends, we suggest the PRT review R1 for clarity on the meaning of the phrase “when the next choice of load to be restored is not driven by the need to control frequency or voltage regardless of whether the Blackstart Resource is located within the TOP’s system.”

In R4, we look for additional guidance on the intent of the type and magnitude of system changes that would require the plan to be updated and provided to the RC.

Response:

The EOP PRT recognizes that strategies are system and company specific and should be left up to the TOP when developing their restoration plan. In the revisions of EOP-005 the EOP PRT will recommend alternate wording in Requirement R1 to capture comments received provided they do not change the intent of Requirement R1.

The EOP PRT recommends Requirement R4 be reviewed for clarity regarding the application of when the 90 calendar days applies and update the associated Measure, if applicable.

Likes:

1 OGE Energy - Oklahoma Gas and Electric Co., 1, Pyle Terri

Dislikes:

0

Jared Shakespeare - Peak Reliability - 1 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Rachel Coyne - Texas Reliability Entity, Inc. - 10 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 - SERC

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Ben Li - Independent Electricity System Operator - 2 - NPCC

Selected Answer:

Answer Comment:

We generally support the EOP PRT's recommendation that the future SDT review industry confusion regarding the application of "unique tasks." Some ISO's system restoration staff has struggled with this term, so any clarity that can be provided (including examples) would be appreciated. If the future SDT believes that the term does not require clarification, then it should confirm that entities have discretion in interpreting it.

Response:

The EOP PRT will recommend that the future SDT review options for clarification of unique tasks, including the possibility of an addition of a rationale box.

Likes: 0

Dislikes: 0

Sergio Banuelos - Tri-State G and T Association, Inc. - 1,3,5 - MRO,WECC

Selected Answer:

Answer Comment:

The PRT is recommending that the future SDT review the evidence retention periods but has not specified exactly which portion or given any reason why they need to be reviewed. What is the PRT recommending for this section and what is their reasoning?

Response:

The EOP PRT is recommending that the future SDT review the evidence retention periods to ensure they align with revisions to the standard.

Likes: 0

Dislikes: 0

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Selected Answer:

Answer Comment:

j. Paragraph 24

Clarification of FERC NOPR comments by BPA: BPA is not confused about what tasks BPA personnel do or apply for restoration as described further in the NOPR comments. BPA commented that maybe the industry could benefit from clarity on what defines a "unique task."

Response:

The EOP PRT will recommend that the future SDT review options for clarification of unique tasks, including the possibility of an addition of a rationale box.

Likes:

0

Dislikes:

0

Leo Staples - OGE Energy - Oklahoma Gas and Electric Co. - 5 -

Selected Answer:**Answer Comment:****Response:****Likes:**

0

Dislikes:

0

minh pham - Los Angeles Department of Water and Power - NA - Not Applicable - WECC

Selected Answer:

Answer Comment:

LADWP requests clarification on what a “unique task” will be defined as in the RSAW, maybe even add it to a future version of the NERC Glossary of Terms.

Response:

The EOP PRT reviewed and determined that there are no additional terms that need to be defined.

The EOP PRT will recommend that the future SDT review options for clarification of unique tasks, including the possibility of an addition of a rationale box.

Likes:

0

Dislikes:

0

Terri Pyle - OGE Energy - Oklahoma Gas and Electric Co. - 1 -

Selected Answer:

Answer Comment:

Response:

Likes:

0

Dislikes: 0

Brad Ryan - Berkshire Hathaway - PacifiCorp - 6 - WECC

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Joshua Andersen - Salt River Project - 1,3,5,6 - WECC

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Daniela Hammons - CenterPoint Energy Houston Electric, LLC - 1 - TRE

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

