Unofficial Comment Form

Project 2009-03 Emergency Operations

Please **DO NOT** use this form for submitting comments. Please use the [electronic form](https://www.nerc.net/nercsurvey/Survey.aspx?s=f8fcff8b88c74b38b5e8db3fade275cd) to submit comments on the Standard Authorization Request (SAR). The electronic comment form must be completed by **December 5, 2013.**

If you have questions please contact [Laura Anderson](mailto:Laura.Anderson@nerc.net) or by telephone at 404-446-9671.

All documents for this project are available on the [project page](http://www.nerc.com/pa/Stand/Pages/Project-2009-03-Emergency-Operations.aspx).

## Background Information

This posting is soliciting informal comment.

On April 22, 2013, the NERC Standards Committee appointed eight subject matter experts to serve on the EOP Five Year Review Team (FYRT). As part of its review, the EOP FYRT referenced background documents including 1) the previously-posted Project 2009-03 EOP SAR (posted 12/07/09 – 01/15/2010, and last modified on 11/05/2010); 2) the currently-enforceable EOP standards; 3) outstanding issues and directives pertaining to the EOP standards; 4) the Independent Experts Report; and, 4) Paragraph 81 criteria. Based on this review, the EOP FYRT developed a set of recommendations for EOP-001-2.1b, EOP-002-3.1 and EOP-003-2.

The EOP FYRT recommendations for EOP-001-2.1b, EOP-002-3.1 and EOP-003-2 were posted for a 45-day comment period from August 6, 2013 through September 19, 2013. There were 25 sets of responses, including comments from approximately 94 different people from approximately 58 companies, representing 8 of the 10 Industry Segments.

The EOP FYRT carefully considered the stakeholder comments received during the posting period and, based on comments, made revisions to its recommendations. To further support its recommendations, the EOP FYRT developed redlined versions of the standards and developed a supplemental SAR for Project 2009-03. Many improvements suggested by stakeholders during the comment period were incorporated into the final recommendations and redlined standards being provided to the Standards Committee.

Based on the EOP FYRT’s discussions and recommendations received during the comment period, the EOP FYRT recommends that the EOP SDT consider the following:

* EOP-001-2.1b, Requirements R1 and R8 should be considered for combination
* The EOP FYRT recommended merging EOP-001-2.1b and EOP-002-3.1 into a single standard and stakeholders agreed with this recommendation. Some stakeholders commented that EOP-003-2 should be included in the merger of EOP-001-2.1b and EOP-002-3.1; although the EOP FYRT did not fully support these comments, a recommendation was made in the Five-Year Review Templates for the future EOP SDT to consider merging these three standards into a single standard.

The complete recommendations of the EOP FYRT are in the attached Five-year Review Templates and redlined versions of the standards are provided as a starting point for the [Project-2009-03-Emergency Operations](http://www.nerc.com/pa/Stand/Pages/Project-2009-03-Emergency-Operations.aspx) drafting team.

This project addresses directives in Paragraph 573 of FERC Order No. 693[[1]](#footnote-1) and Paragraph 595 of FERC Order No. 693[[2]](#footnote-2) and provides additional clarity to many requirements, as well as retiring requirements that meet the criteria of Paragraph 81. Project 2009-03 addresses Emergency Operations and requires coordination with Project 2008-02 Undervoltage Load Shedding to ensure that duplicative requirements are not retained as PRC-010 is developed; therefore, the EOP FYRT considers this project to be high priority.

You do not have to answer all questions. Enter comments in simple text format. Bullets, numbers, and special formatting will not be retained.

## Questions

1. The scope of this project includes:

* Address Five-Year requirement for EOP-001-2.1b, EOP-002-3.1 and EOP-003-2
* Improve quality, relevance and clarity of the standards
* Bring standards into Results-Based format
* Apply Paragraph 81 criteria and recommendations from Independent Expert Review Panel on standards EOP-001, -002, and -003
* Coordinate with Project 2008-02 UVLS to eliminate duplicative requirements

Do you agree with this scope? If not, please explain.

Yes

No

Comments:

1. The SAR identifies a list of reliability functions that may be assigned responsibility for requirements in the set of standards addressed by this SAR. Do you agree with the list of proposed applicable functional entities? If no, please explain.

Yes

No

Comments:

1. Are you aware of any regional variances that will be needed as a result of this project? If yes, please identify the regional variance:

Yes

No

Comments:

1. Are you aware of any business practice that will be needed or that will need to be modified as a result of this project? If yes, please identify the business practice:

Yes

No

Comments:

1. Are you aware of any Canadian provincial or other regulatory requirements that may need to be considered during this project in order to develop a continent-wide approach to the standard(s)? If yes, please identify the jurisdiction and specific regulatory requirements.

Yes

No

Comments:

1. If you have any other comments on this SAR that you haven’t already mentioned above, please provide them here:

Comments:

1. Order No. 693 at P 573 “Demand response covers considerably more resources than interruptible load. Accordingly, the Commission directs the ERO to modify the Reliability Standard to include all technically feasible resource options in the management of emergencies. These options should include generation resources, demand response resources and other technologies that meet comparable technical performance requirements.” [↑](#footnote-ref-1)
2. Order No. 693 at P 595: “The Commission directs the ERO to address the minimum load and maximum time concerns of the Commission through the Reliability Standards development process.” [↑](#footnote-ref-2)