

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

**Summary Consideration:**

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

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

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

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

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

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