Unofficial Comment Form

2015-08 Emergency Operations – EOP-004-4

**Do not** use this form for submitting comments. Use the [electronic form](https://sbs.nerc.net/) to submit comments on **Project 2015-08 Emergency Operations; EOP-004-4 – Event Reporting**. The electronic form must be submitted by **8 p.m. Eastern, Friday, January 6, 2017.
m. Eastern, Thursday, August 20, 2015**

Additional information is available on the [project page](http://www.nerc.com/pa/Stand/Pages/Project-2015-08-Emergency-Operations.aspx). If you have questions, contact Standards Developer, Laura Anderson (via email), or at (404) 446-9671.

## Background Information

Project 2015-08 Emergency Operations (EOP) implements the recommendations of the Project 2015-02 Periodic Review Team (PRT), including the recommendation to revise EOP-004-3 Attachment 1, and retire Requirement R3.[[1]](#footnote-1) The EOP standards drafting team (SDT) considered those recommendations, along with additional input from the industry during the comment period on the project Standard Authorization Request (SAR) for this project. Additionally, the SDT has entered into collaborative efforts among NERC and the U.S. Department of Energy (DOE) to better align reporting requirements pursuant to EOP-004-3 and OE-417. Based on those inputs, the SDT proposes the changes to EOP-004-3 as indicated in this posting.

With respect to DOE collaboration, the SDT has discussed with DOE changes that would be necessary to EOP-004 Attachment 1 and to OE-417 to more closely align EOP-004-4 Attachment 1 Reportable Events with events reported on OE-417. Based on those discussions and the changes proposed in this posting, the SDT and DOE have made significant progress in harmonizing reporting requirements, which would relieve many entities from having to report Reportable Events on both forms. That collaboration continues, but it is important to note that **regardless of whether OE-417 is harmonized with EOP-004-4 Attachment 1, entities will be required to report all Reportable Events as required by EOP-004-4**.

The EOP SDT recommends the following changes to EOP-004-3:

* Update and clarify language in Requirements R1 and R2
* Retire Requirement R3
* Revise Attachment 1: Reportable Events and Attachment 2: Event Reporting Form

Update and Clarify Requirements R1 and R2

The SDT proposes a conforming edit in Requirement R1 to reference the correct version number of EOP-004-4 assuming EOP-004-4 ultimately is approved. Specifically, reference to “EOP-004-3” has been changed to “EOP-004-4.” That conforming change also is made to Measure M1.

The SDT proposes to clarify in Requirement R2 that each Responsible Entity shall report events “specified in EOP-004-4 Attachment 1 to the entities specified” in its Operating Plan. The SDT proposes this addition to ensure the Responsible Entity is reporting on the event types and thresholds from EOP-004-4 Attachment 1. Additionally, the SDT proposes to clarify what constitutes a weekend for the purpose of implementing the requirement, i.e., “4 PM local time will be considered the end of the business day).” The SDT proposes similar language and additional clarifications in Measure M2.

Retire Requirement R3

The SDT recommends retiring Requirement R3 under Criterion B1, administrative, because it requires responsible entities to perform a function that is administrative in nature, does not support reliability, and is needlessly burdensome. The SDT notes that contact lists are administrative in nature and should not be part of a mandatory reliability standard.

Revise Attachment 1: Reportable Events and Attachment 2: Event Reporting Form

The SDT proposes several changes to the Event Type, Entity with Reporting Responsibility, and Threshold for Reporting in response to SAR comments and its own analyses. The SDTs changes intend to: clarify appropriate Responsible Entity responsibilities; eliminate duplicative reporting by the Generator Operator (GOP) and Balancing Authority (BA); clarify Generation loss criteria specific to Quebec Interconnection and ERCOT Interconnection; and align reporting requirements OE-417 where appropriate. The SDT provided its reasoning in the redlined standard.

The SDT proposes several changes to Attachment 2 to clarify to whom the Event Reporting Form should be submitted and to more appropriately describe the “Event Identification and Description” field on the form.

## Questions

1. Do you agree with the SDT’s recommended changes to EOP-004-3, Requirements R1 and R2? If you do not agree, or if you agree but have comments or suggestions on the SDT’s recommendation, please provide your explanation and suggested language.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree with the proposed revisions to EOP-004-3, Attachment 1? If you do not agree, or if you agree but have comments or suggestions on the SDT’s recommendation, please provide your explanation and suggested language.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree with the proposed revisions to EOP-004-3, Attachment 2? If you do not agree, or if you agree but have comments or suggestions on the SDT’s recommendation, please provide your explanation and suggested language.

[ ]  Yes

[ ]  No

Comments:

1. Please provide any additional comments you have on the proposed revisions and clarifications to EOP-004-3.

Comments:

1. The review included EOP-004-3, EOP-005-2, EOP-006-2 and EOP-008-1 to evaluate, for example, whether the requirements are clear and unambiguous. Recommended revisions to EOP-005-2, EOP-006-2, and EOP-008-1 have been posted for comment and ballot in a separate posting. [↑](#footnote-ref-1)