

## Consideration of Comments

**Project Name:** 2015-02 EOP Periodic Review | EOP-004-2

**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
Kaleb Brimhall	Colorado Springs Utilities	5		Colorado Springs Utilities	Shawna Speer	Colorado Springs Utilities	WECC	1
					Charlie Morgan		WECC	3
					Shannon Fair		WECC	6
					Kaleb Brimhall		WECC	5
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
Ben Li	Independent Electricity System Operator	2	NPCC	ISO/RTO Council Standards Review Committee	Charles Yeung	SPP	SPP	2
					Christina Bigelow	ERCOT	TRE	
					Mark Holman	PJM	RFCC	
					Greg Campoli	NYISO	NPCC	
					Ali Miremadi	CAISO	WECC	
					Ben Li	IESO	NPCC	
					Kathleen Goodman	ISO-NE	NPCC	
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		1,3,5,6
					Chuck Lawrence	American Transmission Company		1
					Chuck Wicklund	Otter Tail Power Company		1,3,5
					Dan Inman	Minnkota Power Cooperative, Inc		1,3,5,6
					Dave Rudolph	Basin Electric Power Cooperative		1,3,5,6
					Kayleigh Wilkerson	Lincoln Electric System		1,3,5,6

					Jodi Jenson	Western Area Power Administration		1,6
					Larry Heckert	Alliant Energy		4
					Mahmood Safi	Omaha Public Utility District		1,3,5,6
					Marie Knox	Midwest ISO Inc.		2
					Mike Brytowski	Great River Energy		1,3,5,6
					Randi Nyholm	Minnesota Power		1,5
					Scott Nickels	Rochester Public Utilities		4
					Terry Harbour	MidAmerican Energy Company		1,3,5,6
					Tom Breene	Wisconsin Public Service Corporation		3,4,5,6
					Tony Eddleman	Nebraska Public Power District		1,3,5
Lee Pedowicz	Northeast Power Coordinating Council	10	NPCC	NPCC Proj 2015-02 EOP-004-2	Alan Adamson	New York State Reliability Council, LLC	NPCC	10
					David Burke	Orange and Rockland Utilities Inc.		3

					Greg Campoli	New York Independent System Operator		2
					Sylvain Clermont	Hydro-Quebec TransEnergie		1
					Kelly Dash	Consolidated Edison Co. of New York, Inc.		1
					Gerry Dunbar	Northeast Power Coordinating Council		10
					Kathleen Goodman	ISO - New England		2
					Mark Kenny	Northeast Utilities		1
					Helen Lainis	Independent Electricity System Operator		2
					Alan MacNaughton	New Brunswick Power Corporation		9
					Paul Malozewski	Hydro One Networks Inc.		1
					Bruce Metruck	New York Power Authority		6

					Lee Pedowicz	Northeast Power Coordinating Council		10
					Robert Pellegrini	The United Illuminating Company		1
					Si Truc Phan	Hydro-Quebec TransEnergie		1
					David Ramkalawan	Ontario Power Generation, Inc.		5
					Brian Robinson	Utility Services		8
					Wayne Sipperly	New York Power Authority		5
					Edward Bedder	Orange and Rockland Utilities Inc.		1
					Peter Yost	Consolidated Edison Co. of New York, Inc.		3
					Michael Jones	National Grid		1
					Brian Shanahan	National Grid		1
					Silvia Parada Mitchell	NextEra Energy, LLC		5
					Michael Forte	Consolidated Edison Co. of New York, Inc.		1



					Glen Smith	Entergy Services, Inc.		5
					Brian O'Boyle	Consolidated Edison Co. of New York, Inc.		8
					Connie Lowe	Dominion Resources Services, Inc.		5
					RuiDa Shu	Northeast Power Coordinating Council		10
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
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**1. The EOP PRT's initial recommendation outlines three (3) clarifying revisions to Attachment 1 of EOP-004-2. 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 will recommend in the SAR for the future drafting team to review recommendations based on the comments received for Attachment 1, but will not suggest specific rewrites. The EOP PRT believes all recommendations have merit and need a thorough review by the future SDT when formed for this standard.

Many other commenters believe this standard should be modified; and, therefore, the EOP PRT will provide in the SAR the changes as recommended.

In support of comments received, the EOP PRT will recommend for the future drafting team to include additional information in the Guideline and Technical Basis regarding the good practice of physically and digitally surveying control houses following a breach.

The EOP PRT will recommend that the future SDT take into account regional differences when reviewing 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: Yes

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

Likes: 0

Dislikes: 0

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

Selected Answer: Yes

**Answer Comment:**

With the addition of “Do not report theft unless it degrades normal operation of a Facility” criteria to ‘Damage or Destruction of a Facility’, recommend removal of “Do not report theft unless it degrades normal operation of a Facility” from ‘Physical Threats to a Facility’. Theft would now be (more appropriately) reportable under a ‘Damage or Destruction’ event.

**Response:**

The EOP PRT will recommend in the SAR for the future drafting team to review recommendations based on the comments received for Attachment 1, but will not suggest specific rewrites. The EOP PRT believes all recommendations have merit and need a thorough review by the future SDT when formed for this standard.

Likes: 0

Dislikes: 0

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**Leonard Kula - Independent Electricity System Operator - 2 -**

Selected Answer: No

**Answer Comment:**

**We agree with the initial recommendation which outlines three clarifying revisions to Attachment 1 of EOP-004-2, but believe that this recommendation falls way short of providing the needed clarity to the obligations of the Responsible Entities listed in Attachment 1. We further believe that certain items listed in Attachment 1 serve to support post-mortem analysis but do not contribute to operating reliability, and may be redundant with similar requirements already stipulated in the Event Analysis Process document. We therefore offer the following comments:**

**a. The lack of clarity can result in registered entities being found potentially non-compliant with certain requirements. As an example, on P.10 of EOP-004-2, when there is a loss of firm load &ge; 300 MW for entities with previous year's demand &ge; 3,000 or &ge; 200 MW for all other entities, the BA, TOP or DP is held responsible for reporting. It is unclear on the size of MW in relation to which particular entity's previous year's demand size, and whether or not all three entities are responsible for reporting, or just one of them needs to report, and if so, which one of the three? Also, if it is meant to be one of the three, it is not clear whether or not the location or area within which the load loss occurs would dictate which one of the three entities has that obligation.**

**When the loss of load occurs in a distribution system, is it the DP's obligation to report? Likewise, is the TOP obligated to report when the loss involves those loads that are tapped off the transmission network? Depending on the answer to the above, what is the role of the BA? Finally, if all three are obligated to report, doesn't the requirement make it cumbersome and redundant when all three entities files reports to the recipient entities/authorities?**

We believe that Attachment 1 needs to be revised to clarify the 3000 MW relationship with a specific entity's previous year's demand, and to hold a single entity responsible for reporting this type of events. The latter recommendation also applies to other events in Attachment 1 where there are multiple entities listed as having the obligation to take actions.

b. We believe that the requirement to report loss of load is not needed for reliability, unlike their interruption to BES facility counterparts. Loss of load is usually caused by loss of facilities, or by frequency or voltage excursions resulting from events that are already listed in Attachment 1 (e.g., voltage deviation, generation loss, etc.). We further believe that while this information is needed for post-mortem event analysis, this information reporting requirement is already stipulated in the Event Analysis Process document, and mandated by local regulatory authorities. Reporting such events to the ERO, the RE and other entities is redundant and does not help to improve operating reliability. Further, since loss of load by itself does not have any impact on the Bulk Electric System reliability, reporting such events is inconsistent with the principle "...to report disturbances and events that threaten the reliability of the Bulk Electric System" as indicated in the Guideline and Technical Basis of the standard. We therefore suggest that this requirement be removed from Attachment 1 as it is not needed for operating reliability and is redundant with the requirement for event analysis stipulated elsewhere or mandated by local regulatory authorities.

c. If for whatever reasons the loss of load reporting requirement is retained in Attachment 1, we request the SDT to provide the technical justification for the threshold values of  $\geq$  300 MW for entities with previous year's demand  $\geq$  3,000 or  $\geq$  200 MW for all other entities. We believe these thresholds are too low to warrant any special attention and reporting burden by the Responsible Entities. For example, an area load of several hundred MW that is normally supplied by two transmission lines may be lost due to one of the lines being out of serviced for maintenance while the other suffering a contingency loss. To avoid having to report such load loss resulting from routine operating practices and recognized contingencies (with respect to design and operating criteria), we believe the reporting threshold should be raised to a level of at least 1,000 MW. We further suggest the SDT seek input from the NERC technical committees on the threshold values if the SDT should decide to keep this requirement, which we believe is not needed for operating reliability.

**Response:** The EOP PRT will recommend in the SAR for the future drafting team to review recommendations based on the comments received for Attachment 1, but will not suggest specific rewrites. The EOP PRT believes all recommendations have merit and need a thorough review by the future SDT when formed for this standard.

**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:** No

**Answer Comment:**

NSRF requests clarifying language in Attachment 1, Row 1 on page 8 for the event type “Damage or Destruction of a Facility”. “Damage or destruction” should apply to an identified CIP-014-1 facility or damage that causes a generation or transmission EEA level 3 event. At a minimum it should also differentiate between internal fault-generated damage and externally applied damage.

NSRF agrees with the drafting team recommendation to add the phrase “Do not report theft unless it degrades normal operation of a Facility” criteria from ‘Physical Threats to a Facility,’ to ‘Damage or Destruction of a Facility;’ (add to third column of second row on Page 8 of the standard in Attachment 1). This helps clarify the difference between incidental theft that has little to no system reliability impact and a theft that impacts reliability.

NSRF agrees with the drafting team recommendation to add information in the Guideline and Technical Basis regarding the good practice of physically and digitally surveying control houses following a breach provided it is made clear that this is a good practice and does not become part of the RSAWs where NERC includes requirements beyond what’s required in the NERC requirements.

NSRF agrees with the drafting team recommendation to clarify “initiating entity” along with all the Responsible Entity shall notify “parties” per Requirement R2. Initiating entity and parties should be clarified to be the entities identified in the Responsible Entity’s EOP-004 disturbance reporting plan.

NSRF does not agree with the drafting team recommendation to change “load” to the defined term “Load” as this changes the meaning of the concrete measurements in Attachment 1. The loads in Attachment 1 are physical end use load in MW.

NSRF does not understand the PRT statement [page 5 section 3], (“Load is not a physical end use device, but the existence of the capacity to deliver electric energy – MW reduction”). This contradicts the NERC definition of Load (An end-use device or customer that receives power from the electric system) The EOP PRT recommends review by the future SDT of the term “load” in EOP-004-2 and revise to “Load” if the future SDT determines “load” is intended to be the defined term “Load3,” and to review the term for conflict with applicable entity (“Load is not a physical end use device, but the existence of the capability to deliver electric energy – MW reduction”). This change would completely reverse the meaning of event types referencing load reduction, shedding, and loss.



Moreover, this would result in an even more extreme interpretation of generation loss, reducing the threshold from actual specified generation loss to a loss of capacity to deliver electric energy, whether or not the generator is on-line.

In any event, this section is confusing and the PRTR should devise clearer issues by describing the problem, and proposed solutions for this confusing issue.

**Response:**

The EOP PRT will recommend in the SAR for the future drafting team to review recommendations based on the comments received for Attachment 1, but will not suggest specific rewrites. The EOP PRT believes all recommendations have merit and need a thorough review by the future SDT when formed for this standard.

**Likes:**

0

**Dislikes:**

0

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**Kaleb Brimhall - Colorado Springs Utilities - 5 -**

**Selected Answer:**

No

**Answer Comment:**

We do not think revisions are necessary, the standard is well written.

**Response:**

The EOP PRT appreciates your comment. Many other commenters believe this standard should be modified; and, therefore, the EOP PRT will provide in the SAR the changes as recommended, except for those noted in the responses here.

Likes: 0

Dislikes: 0

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

Selected Answer: No

**Answer Comment:**

The recommendation regarding the good practice of physically and digitally surveying control houses following a breach does not belong in this standard. If the EOP PRT thinks it has value, Dominion recommends they forward that recommendation to those developing CIP-014 (physical security).

**Response:**

The EOP PRT appreciates your comment. In support of comments received, the EOP PRT will recommend for the future drafting team to include additional information in the Guideline and Technical Basis regarding the good practice of physically and digitally surveying control houses following a breach.

Likes: 0

Dislikes: 0

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**Thomas Foltz - AEP - 5 -**

Selected Answer: Yes

Answer Comment:

Response:

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 drafting team's recommendation (1) to include additional information in the Guideline and Technical Basis regarding the good practice of physically and digitally surveying control houses following a breach. However, Reclamation notes the inclusion of the new term "control houses" and suggests that the drafting team replace the term with "BES facilities" to avoid confusion.

Reclamation also agrees with the drafting team's recommendation (2) to add the phrase "Do not report theft unless it degrades normal operation of a Facility" to "Damage or destruction of a facility" on page 8 of Attachment 1.

Reclamation also agrees with the drafting team's recommendation (3) to review page 9 of Attachment 1 for revision of Entity with Reporting Responsibility for proper application of initiating entity. Reclamation suggests that Reliability Coordinators, Transmission Operators, Balancing Authorities, or Distribution Providers would generally initiate BES Emergencies requiring public appeals for load reduction, system-wide voltage reduction, or manual firm load shedding.

**Response:**

The EOP PRT appreciates your comments. In support of comments received, the EOP PRT will recommend for the future drafting team to include additional information in the Guideline and Technical Basis regarding the good practice of physically and digitally surveying control houses following a breach.

The EOP PRT will recommend in the SAR for the future drafting team to review recommendations based on the comments received for Attachment 1, but will not suggest specific rewrites. The EOP PRT believes all recommendations have merit and need a thorough review by the future SDT when formed for this standard.

**Likes:** 0

**Dislikes:** 0

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

Selected Answer: Yes

**Answer Comment:**

**We recommend that the Reliability Standard be revised to require that only one report be required per event. For example, for an event type that is applicable to a RC, BA, and TOP, and an event occurs in the TOP Area, there would not be a requirement for both the TOP and the RC to submit a report. Some Regional Entities have interpreted the current Reliability Standard to require multiple reports if the RC and TOP are not within the same corporate structure.**

**Response:**

The EOP PRT received additional comments and heard discussion in various webinars to this issue. The EOP PRT will include in the SAR for the future drafting team to determine how this issue can be addressed.

Likes: 0

Dislikes: 0

**David Jendras - Ameren - Ameren Services - 3 -**

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: No

**Answer Comment:**

ERCOT agrees with certain recommendations made by the review team, but disagrees with others. In particular, ERCOT disagrees with the review team's recommendations as follows:

1. ERCOT respectfully submits that the recommendation for the placement of the language regarding theft from a facility should be included under the "Damage or

Destruction Of a Facility” rows or rows 1 and 2 on page 8 of the standard.

2. Relative to the removal of the GOP from the “Generation Loss” reporting, ERCOT respectfully submits that GOPs will have more data and information regarding the event that caused there facility to go off-line. This data should be utilized in concert with BA data to evaluate events. Without GOP level input and insights, event reporting for generation losses may occur at too high of a level to effectively discern trends and threats.

3. While ERCOT agrees with and supports the review team’s recommendation to review the “Entity with Reporting Responsibility,” it believes that the review missed the opportunity to provide additional guidance to future drafting team efforts beyond the recommendations for GOPs above. ERCOT would encourage the review to provide additional guidance to the drafting team that places immediate reporting responsibility on the entity closest to or most impacted by an event. As an example, RCs are required to report events that damage or destroy a Facility, which is defined as “[a] set of electrical equipment that operates as a single Bulk Electric System Element (e.g., a line, a generator, a shunt compensator, transformer, etc.). RCs and BAs are often not co-located with Facilities such that they would be in a position to immediately report on damage to a Facility. In fact, if such damage did not impact the electrical capacity or operation of the Facility, the RC or BA would likely be unaware of any damage to the Facility until notified by the TOP. The review should provide additional guidance on this issue.

4. To the extent possible, ERCOT recommends that clarifications or additional criteria, such as those that the review team provided from the Form DOE-417, should be considered for inclusion in Attachment A to EOP-004. Inclusion of such additional criteria or clarifications would drive consistency in reporting as well as provide guidance and appropriate division regarding initial reporting responsibilities. In particular, if TOPs are the responsible party for initiating the reporting of events associated with damage to or destruction of a Facility that provides a major interruption or impact and RCs, BAs, or the initiating entity are responsible for reporting the BES emergency based on other defined event types, reporting redundancy would be reduced and the most impacted or appropriate entity would be responsible for reporting. ERCOT urges the review team to address this issue.

**Response:**

The EOP PRT will recommend that the future SDT take into account regional differences when reviewing the standard. The EOP PRT will recommend in the SAR for the future drafting team to review recommendations based on the comments received for Attachment 1, but

will not suggest specific rewrites. The EOP PRT believes all recommendations have merit and need a thorough review by the future SDT when formed for this standard.

**Likes:** 0

**Dislikes:** 0

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**Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC**

**Selected Answer:** No

**Answer Comment:**

Regarding the four bullets that are listed under Item 2c on pages 4 and 5:

First bullet--It is a good idea for adding information for including physically and digitally surveying control houses. What constitutes a digital survey? Also, the surveys should not be limited to control houses. There are installations where freestanding control panels are mounted outside of control houses.

We propose the following wording for the "Event Type" of "Physical threats to a facility" listed in Attachment 1:

"Physical threat to its Facility excluding weather or natural disaster related threats, which has the potential to degrade the normal operation of the Facility.

OR

Suspicious device or activity at a Facility, where "suspicious activity" means any observed behavior reasonably indicative of criminal intent to degrade normal operation of a BES facility, unless verified to be otherwise within the R2 reporting timeframe (i.e., 24 hours).



Do not report theft unless it degrades normal operation of a Facility.”

It would also be beneficial to define the term “suspicious activity” since it shows up repeatedly throughout the standard.

Third bullet--Agree.

Fourth bullet--Agree.

**Response:**

The EOP PRT appreciates your comments. In support of comments received, the EOP PRT will recommend for the future drafting team to include additional information in the Guideline and Technical Basis regarding the good practice of physically and digitally surveying control houses following a breach.

The EOP PRT will recommend in the SAR for the future drafting team to review recommendations based on the comments received for Attachment 1, but will not suggest specific rewrites. The EOP PRT believes all recommendations have merit and need a thorough review by the future SDT when formed for this standard.

**Likes:** 0

**Dislikes:** 0

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**Andrew Pusztai - American Transmission Company, LLC - 1 -**

Selected Answer:

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

**Molly Devine - IDACORP - Idaho Power Company - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

**Mark Kenny - Northeast Utilities - 3 -**

Selected Answer: No

**Answer Comment:**

Regarding the four bullets that are listed under Item 2c on pages 4 and 5:

First bullet--It is a good idea for adding information for including physically and digitally surveying control houses. What constitutes a digital survey? Also, the surveys should not be limited to control houses. There are installations where freestanding control panels are mounted outside control houses.

Second bullet--Disagree with adding "Do not report theft unless it degrades normal operation of a Facility" to the damage or destruction of a facility. Any such attempts should be made known to establish possible patterns to aid in prevention of future occurrences.

Third bullet--Agree

Fourth bullet--Agree.

**Response:**

The EOP PRT appreciates your comments. In support of comments received, the EOP PRT will recommend for the future drafting team to include additional information in the Guideline and Technical Basis regarding the good practice of physically and digitally surveying control houses following a breach.

The EOP PRT will recommend in the SAR for the future drafting team to review recommendations based on the comments received for Attachment 1, but will not suggest specific rewrites. The EOP PRT believes all recommendations have merit and need a thorough review by the future SDT when formed for this standard.

**Likes:** 0

**Dislikes:** 0

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**Ben Engelby - ACES Power Marketing - 6 -**

Selected Answer: Yes

**Answer Comment:**

We agree with the EOP PRT's recommendation to revise EOP-004-2 and we agree that Attachment 1 should be reviewed for consistency in timeframe, MW values, and BES applicability threshold.

**Response:**

The EOP PRT will recommend in the SAR for the future drafting team to review recommendations based on the comments received for Attachment 1, but will not suggest specific rewrites. The EOP PRT believes all recommendations have merit and need a thorough review by the future SDT when formed for this standard.

**Likes:**

0

**Dislikes:**

0

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**Michelle D'Antuono - Oxy - Ingleside Cogeneration LP - 5 -**

## Selected Answer:

Yes

**Answer Comment:**

Ingleside Cogeneration LP (ICLP) agrees with the three proposed modifications to EOP-004-2's reportable events table. In particular, we support the removal of the GOP as a reporting entity for generation outages above a certain capacity level (1000+ MW in ERCOT and Quebec; 2000+ MW elsewhere). As the PRT has concluded, a GOP submission would capture only a subset of the data available to the Host BA – and could even confuse the recipients if the format or data-types vary. In addition, the BA or the Events Analysis team could bring the GOP into a post-mortem investigation if further information is needed.

**Response:**

Thank you for your support.

**Likes:** 0

**Dislikes:** 0

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

**Selected Answer:** Yes

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

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

**Selected Answer:**

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

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

**Selected Answer:** Yes

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

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

**Selected Answer:**

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

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

Selected Answer: No

**Answer Comment:**

For a Distribution Provider, R3 is purely administrative in the case where a Distribution Provider has no reporting requirements. There may be no contacts needed for the DP so the burden of having to provide evidence that shows "no contacts" provides no reliability benefit. The reliability benefit is found more in the area of the BA or TOP and not a DP with load below 100MW. We suggest the PRT review the applicability of this requirement.

The VRF's for R1 and R3 do not seem consistent. We recommend the review team review the importance of R1 vs R3 to ensure the VRF's are set appropriately. It seems more importance is placed on having an updated contact list (R3) versus having an Operating Plan for reporting (R1) due to the different VRF's.

**Response:**

The EOP SDT will be recommending retirement of Requirement R3. Please see responses in Question Number 2.

**Likes:** 3 OGE Energy - Oklahoma Gas and Electric Co., 3, Hargrove Donald  
OGE Energy - Oklahoma Gas and Electric Co., 5, Staples Leo  
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

**Donald Hargrove - OGE Energy - Oklahoma Gas and Electric Co. - 3 -**

Selected Answer:

**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

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

Selected Answer: Yes

**Answer Comment:****Response:****Likes:** 0**Dislikes:** 0

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

Selected Answer: No

**Answer Comment:**

BPA suggests deleting the first bullet under c. Attachment 1 - The EOP PRT recommends the future Standard Drafting Team (SDT) consider the following revisions to Attachment 1 for clarity regarding:

• Include additional information in the Guideline and Technical Basis regarding the good practice of physically and digitally surveying control houses following a breach.

BPA believes this is applicable to security personnel after the fact and primarily to CIP-014 security plans.

**Response:**

The EOP PRT will recommend in the SAR for the future drafting team to review recommendations based on the comments received for Attachment 1, but will not suggest specific rewrites. The EOP PRT believes all recommendations have merit and need a thorough review by the future SDT when formed for this standard.

**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

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

Selected Answer:

**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

**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:

**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

**2. The EOP PRT is not proposing any retirements to the requirements of EOP-004-2 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:** With regard to Requirement R3, due to comments received, the EOP PRT has decided to recommend retirement of Requirement R3. Retirement of Requirement R3 resolves any issues related to VRF designations related to Requirement R3.

EOP-004 does not apply to, impact, or otherwise support Real-time operations. The SDT states on Page 14 of EOP-004-2 (and reiterates on Page 18 Introduction of Reporting Concepts), "The DSR SDT wishes to make clear that the proposed Standard does not include any

real-time operating notifications for the events listed in EOP-004 Attachment 1. Real-time communication is achieved is covered in other standards. The proposed standard deals exclusively with after-the-fact reporting.”

Requirement R2 requires reporting an event “within 24 hours of recognition of meeting an event type threshold for reporting or by the end of the next business day if the event occurs on a weekend...” The allowance to await the resumption of the normal work week to submit the report clearly shows the reporting requirement has no relation to real-time operations.

Again, this Standard is intended to provide after-the-fact reporting; at which time, the time it would take to look up a changed contact number will not negatively impact reliability. This meets Paragraph 81 Criterion B5: Periodic Updates - for requiring periodic updates to a plan without an operational benefit to reliability.

The EOP PRT understands that there are efficiencies to be gained between ERO and ES-ISAC reporting; the EOP PRT will recommend that the future SDT review for compatibility. DOE reporting is outside the jurisdiction of NERC.

**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

---

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

Selected Answer: Yes

**Answer Comment:**

Related to 1. Paragraph 81:

First paragraph last sentence – “Requirement R3, while administrative, does support real-time operations as a function necessary to promote reliability *reporting*”

Last paragraph – R3 is a medium VRF level

**Response:** With regard to Requirement R3, due to comments received, the EOP PRT has decided to recommend retirement of Requirement R3. Retirement of Requirement R3 resolves any issues related to VRF designations related to Requirement R3.

**Likes:** 0

**Dislikes:** 0

---

**Leonard Kula - Independent Electricity System Operator - 2 -**

**Selected Answer:** No

**Answer Comment:** Please see our proposed retirement of the loss of load reporting requirement under Q1, above.

**Response:** Thank you for your comment. Please see response in Question 1.

**Likes:** 0

**Dislikes:** 0

---

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

**Selected Answer:** Yes



**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

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

**Selected Answer:** No

**Answer Comment:**

The EOP PRT justifies retaining Requirement R3, despite it being administrative, as supporting real-time operations as a function necessary to promote reliability. This justification is inconsistent with both the guidelines of the SDT and the reporting timelines for Requirement R2.

This Standard does not apply to, impact, or otherwise support real-time operations. The SDT states on page 14 (of EOP-004-2), "The DSR SDT wishes to make clear that the proposed Standard does not include any real-time operating notifications for the events listed in EOP-004 Attachment 1. Real-time communication is achieved and covered in other standards. The proposed standard deals exclusively with after-the-fact reporting." This is reiterated on page 18 in the Introduction of Reporting Concepts.

Requirement R2 requires reporting an event "within 24 hours of recognition of meeting an event type threshold for reporting or by the end of the next business day if the event occurs on a weekend..." The allowance to await the resumption of the normal work week to submit the report clearly shows the reporting requirement has no relation to real-time operations.

Requirement R3 is justified by an assertion that “During Emergency operations, operators should not be burdened with looking up contact information or having invalid phone numbers.” Again, this Standard is intended to provide after-the-fact reporting, at which time the time it would take to look up a changed contact number will not negatively impact reliability. This meets Paragraph 81 Criteria B5, Periodic Updates, for requiring periodic updates to a plan without an operational benefit to reliability.

**Response:**

With regard to Requirement R3, due to comments received, the EOP PRT has decided to recommend retirement of Requirement R3. Retirement of Requirement R3 resolves any issues related to VRF designations related to Requirement R3.

**Likes:**

1 Berkshire Hathaway - PacifiCorp, 6, Ryan Brad

**Dislikes:**

0

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**Kaleb Brimhall - Colorado Springs Utilities - 5 -**
**Selected Answer:**

Yes

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

0

**Dislikes:** 0

---

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

**Selected Answer:** No

**Answer Comment:**

Dominion agrees with IERP that R3 (contact numbers) should either be retired, or at least included within R1. While we don't disagree that operators should not have to 'look the numbers up', R1 could be more prescriptive and explicitly state need to include contact information in the Operating Plan to address the EOP PRT concern (without adding a specifically administrative compliance burden). However, we believe it is already inferred, as we don't know how one could argue that their Operating Plan is sufficient if it failed to include contact information in its "protocol(s) for reporting".....

R3 VRF is Medium; the template says this is High.

**Response:**

With regard to Requirement R3, due to comments received, the EOP PRT has decided to recommend retirement of Requirement R3. Retirement of Requirement R3 resolves any issues related to VRF designations related to Requirement R3.

**Likes:** 0

**Dislikes:** 0

---

**Thomas Foltz - AEP - 5 -**

Selected Answer: Yes

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

---

**Brian Bartos - CPS Energy - 3 -**

Selected Answer: Yes

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

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

Selected Answer: Yes

**Answer Comment:**

Reclamation agrees with the drafting team's recommendation to retain R3 as a standalone requirement that registered entities annually verify contact information included in the Operating Plan to verify its accuracy. Reclamation agrees with the drafting team's rationale that during Emergency operations, operators should not be burdened with looking up contact information or having invalid phone numbers.

**Response:**

With regard to Requirement R3, due to comments received, the EOP PRT has decided to recommend retirement of Requirement R3. Retirement of Requirement R3 resolves any issues related to VRF designations related to Requirement R3.

**Likes:** 0

**Dislikes:** 0

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

Selected Answer: Yes

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

**Likes:** 0

**Dislikes:** 0

**David Jendras - Ameren - Ameren Services - 3 -**

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 disagree with the PRTs recommendation and logic for not retiring R3. They've conceded that R3 is administrative. An entity has 24 hours to submit the report. As well, contact information can change at any time, sometimes without notice so verification once annually is ineffective and may falsely imply accuracy. I believe a good practice is to keep a central directory of contact information to which plans refer to. This avoids fragmentation. However, a good practice is for a user to always verify information at its source. This holds true for any type of information. So long as a good description of the entities and the specific departments/personnel and their titles to which need notifying are provided in the plan, the user can look up the contact information and get the most recent information.

**Response:**

With regard to Requirement R3, due to comments received, the EOP PRT has decided to recommend retirement of Requirement R3. Retirement of Requirement R3 resolves any issues related to VRF designations related to Requirement R3.

**Likes:** 0

**Dislikes:** 0

---

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

**Selected Answer:** No

**Answer Comment:**

ERCOT disagrees that the validation of contact information provides direct value to reliability. Further, it believes that it meets all applicable criteria set forth in Attachment 2 to be retired consistent with Paragraph 81 as follows:

1. The requirement is purely administrative.
2. The requirement is simply a data validation effort.
3. The requirement produces documentation that contact numbers were validated and does not directly impact reliability.
4. The requirement would, at most, trigger entities to periodically update documentation if a contact number changed.

ERCOT supports the retirement of Requirement R3 consistent with Paragraph 81.

**Response:**

With regard to Requirement R3, due to comments received, the EOP PRT has decided to recommend retirement of Requirement R3. Retirement of Requirement R3 resolves any issues related to VRF designations related to Requirement R3.

**Likes:** 0

**Dislikes:** 0

**Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC**

**Selected Answer:** Yes

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

**Andrew Puztai - American Transmission Company, LLC - 1 -**

**Selected Answer:** No

**Answer Comment:**

- The Independent Expert Review Project (IERP) recommended that Requirement # 3 be retired or combined with Requirement # 1. The Periodic Review Team suggests that Requirement # 3 not be retired. ATC does not agree with the Periodic Review Team. ATC supports the IERP recommendation to retire Requirement # 3. ATC believes Requirement # 3 is an “administrative” requirement which does meet Paragraph



81 criteria. Requirement # 1 requires Registered Entities to have an event Reporting Plan which includes the protocol(s) for reporting to applicable regulatory authorities. ATC believes that Requirement # 1 compels Registered Entities to assure that the protocols, including contact information, be maintained in a condition that supports reliable operations. Since Requirement # 1 requires protocols for reporting events, which are assumed to require appropriate, up-to-date contact information, Requirement # 3 appears to be an duplicative and unnecessary requirement.

- • ATC also believes that Requirement # 3 fits into Criterion # B5 of the “Paragraph 81 Criteria” and, as such, warrants the retirement of the Requirement.

- The Periodic Review Team suggest that it would be inappropriate to combine Requirement # 1 with Requirement # 3 because Requirement # 1 has a “low” VRF and a Requirement # 3 has a “high” VRF. ATC believes that the Periodic Review Team has erroneously identified that Requirement # 3 has a “medium” VRF. The VRF for Requirement # 3 is actually listed in the Standard as “medium.” Reluctance to combine requirements because the VRFs for the requirements are different is not a reasonable justification for not eliminating or combine requirements. If Requirements # 3 is not retired, then ATC strongly believes an appropriate action would be to combine Requirement # 1 with Requirement # 3.

**Response:**

With regard to Requirement R3, due to comments received, the EOP PRT has decided to recommend retirement of Requirement R3. Retirement of Requirement R3 resolves any issues related to VRF designations related to Requirement R3.

**Likes:**

0

**Dislikes:**

0

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**Molly Devine - IDACORP - Idaho Power Company - 1 -**

Selected Answer: Yes

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

Likes: 0

Dislikes: 0

---

**Mark Kenny - Northeast Utilities - 3 -**

Selected Answer: No

**Answer Comment:**

We agree with the recommendation of the IERT to retire R3 as administrative in nature. Accuracy of an entity's Operating Plan is inherent in Requirement 1.

**Response:**

With regard to Requirement R3, due to comments received, the EOP PRT has decided to recommend retirement of Requirement R3. Retirement of Requirement R3 resolves any issues related to VRF designations related to Requirement R3.

Likes: 0

**Dislikes:** 0

---

**Ben Engelby - ACES Power Marketing - 6 -**

**Selected Answer:** No

**Answer Comment:**

(1) We disagree with the EOP PRT's recommendation to keep the annual verification of contact information as stated in Requirement R3 intact. The Independent Expert Review Project (IERP) correctly identified a requirement that could be combined into R1. The Operating Plan could be subject to an annual review, which the contact information would be expected to be updated. This could be outlined in a Measure.

(2) We also question why the PRT is taking an approach of keeping a requirement identified as meeting Paragraph 81 criteria. We suggest removing the requirement because it is administrative in nature and could be verified through an annual review of the Operating Plan in R1.

(3) If the Operating Plan was required to be verified each year, this would benefit reliability more than just verifying contact information. The registered entity would need to review the entire plan to determine if any changes need to be made to the procedures, including the contact information.

**Response:** With regard to Requirement R3, due to comments received, the EOP PRT has decided to recommend retirement of Requirement R3. Retirement of Requirement R3 resolves any issues related to VRF designations related to Requirement R3.

**Likes:** 0

**Dislikes:** 0

---

**Michelle D'Antuono - Oxy - Ingleside Cogeneration LP - 5 -**

**Selected Answer:** No

**Answer Comment:**

ICLP believes another effort needs to be made to consolidate Event Reporting requirements across the ERO, the DOE, and ES-ISAC. Some progress was made during the development stage of EOP-004-2, but there are still efficiencies to be gained. That project team had to defer progress in this area due to time constraints that no longer exist.

**Response:**

The EOP PRT understands that there are efficiencies to be gained between ERO and ES-ISAC reporting; the EOP PRT will recommend that the future SDT review for compatibility. DOE reporting is outside the jurisdiction of NERC.

**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

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

Selected Answer:

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

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

Selected Answer: Yes

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

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

Selected Answer:

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

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

Selected Answer:

**Answer Comment:**

**Response:**

**Likes:** 1 OGE Energy - Oklahoma Gas and Electric Co., 5, Staples Leo

**Dislikes:** 0

**Jared Shakespeare - Peak Reliability - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

**Donald Hargrove - OGE Energy - Oklahoma Gas and Electric Co. - 3 -**

Selected Answer:

**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

---

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

Selected Answer: Yes

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

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

Selected Answer: No

**Answer Comment:**

BPA disagrees with the retention of R3 recommendation; it is not necessary to add an administrative process, an annual validation of law enforcement contacts, as a Standard's Requirement.

**Response:**

With regard to Requirement R3, due to comments received, the EOP PRT has decided to recommend retirement of Requirement R3. Retirement of Requirement R3 resolves any issues related to VRF designations related to Requirement R3.

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

---

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

Selected Answer:

**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

---

**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:

**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

**3. Do you agree with the initial recommendation of the EOP PRT regarding EOP-004-2? If not, please explain specifically what aspects of the recommendation you disagree with.**

**Summary:** The changes being recommended by the EOP PRT are intended to bring clarity to the well-written standard.

The intent of the EOP PRT was to review whether the glossary term “Load” should be used or to leave it as “load,” as currently written. The EOP PRT has discussed the term “load” and will recommend review by the future SDT of the term “load” in EOP-004-2. The defined term “Load,” does not reconcile with the intent of the term load in the standard.

The EOP PRT will recommend in the SAR for the future drafting team to review recommendations based on the comments received for Attachment 1, but will not suggest specific rewrites. The EOP PRT believes all recommendations have merit and need a thorough review by the future SDT when formed for this standard.

The EOP PRT understands that there are efficiencies to be gained between ERO and ES-ISAC reporting; the EOP PRT will recommend that the future SDT review for compatibility. DOE reporting is outside the jurisdiction of NERC.

With regard to R3, many individuals disagreed with the EOP PRT recommendation not to retire R3. The EOP PRT has been persuaded for the reasons listed in the Summary above, and now agrees to recommend retirement of Requirement R3. Retirement of Requirement R3 resolves any issues related to VRF designations related to Requirement R3.

**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

---

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

Selected Answer: Yes

**Answer Comment:**

N/A

**Response:**

**Likes:** 0

**Dislikes:** 0

---

**Leonard Kula - Independent Electricity System Operator - 2 -**

Selected Answer: Yes

**Answer Comment:**

**We strongly agree with Recommendation 2(b) to improve the clarity for the VSL for Requirement R2 by adding “recognition of” to the threshold of VSL table for Requirement R2 to provide the needed consistency between the requirement and the measure. Absent this phrase, some entities have been found potentially non-compliant with Requirement R2 when these entities did not report the events within 24 hours of their occurrence despite the reporting was made within 24 hours of recognizing that such events met the event type threshold for reporting.**

**Response:** Thank you for your support.

**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:**

We do not think revisions are necessary, the standard is well written.

**Response:**

The EOP PRT appreciates your comment. The changes being recommended by the EOP PRT are intended to bring clarity to the well-written standard.

Likes: 0



**Dislikes:** 0

---

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

**Selected Answer:** No

**Answer Comment:**

As indicated in response to first 2 questions. Dominion does not understand the intent of the PRT's comment relative to the word load. If the recommendation had stopped at, recommending the SDT determine whether the defined term Load should be used as opposed to the word load, we would have at least understood, please clarify the intent.

Also, Dominion does not understand the intent of the EOP PRT; the inclusion of "...to review the term for conflict with applicable entity.." , please clarify the intent.

**Response:**

The intent of the EOP PRT was to review whether the glossary term "Load" should be used or to leave it as "load," as currently written. The EOP PRT has discussed the term "load" and will recommend review by the future SDT of the term "load" in EOP-004-2. The defined term "Load," does not reconcile with the intent of the term load in the standard.

The EOP PRT will recommend in the SAR for the future drafting team to review recommendations based on the comments received for Attachment 1, but will not suggest specific rewrites. The EOP PRT believes all recommendations have merit and need a thorough review by the future SDT when formed for this standard.

**Likes:** 0

**Dislikes:** 0

---

**Thomas Foltz - AEP - 5 -**

**Selected Answer:** Yes

**Answer Comment:**

**Response:**

**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

---

**David Jendras - Ameren - Ameren Services - 3 -**

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: No

**Answer Comment:**

ERCOT agrees and disagrees with aspects of the review teams initial recommendations as set forth above. In addition, the IRC notes its strong support for Recommendation 2(b) to improve the clarity for the VSL for Requirement R2 by adding “recognition of” to the threshold of VSL table for Requirement R2 to provide the needed consistency between the requirement and the measure. Absent this phrase, entities can be found potentially non-compliant with Requirement R2 when these entities did not report the events within 24 hours of their occurrence despite the reporting being made within 24 hours of recognizing that such events met the event type threshold for reporting. An example of how this disconnect may occur is the damage to a facility. In particular, a TOP or GOP may be aware of damage and report such damage, but – if there was not a BA or RC-level notification – the BA or RC would have no knowledge of a reportable event.

**Response:**

The EOP PRT will recommend in the SAR for the future drafting team to review recommendations based on the comments received for Attachment 1, but will not suggest specific rewrites. The EOP PRT believes all recommendations have merit and need a thorough review by the future SDT when formed for this standard.

**Likes:**

0

**Dislikes:**

0

**Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC****Selected Answer:**

Yes

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

**Likes:** 0

**Dislikes:** 0

**Andrew Pusztai - American Transmission Company, LLC - 1 -**

Selected Answer:

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

**Molly Devine - IDACORP - Idaho Power Company - 1 -**

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

---

**Ben Engelby - ACES Power Marketing - 6 -**

Selected Answer: No

**Answer Comment:**

(1) The phrase in Requirement R1, "e.g., the Regional Entity, company personnel, the Responsible Entity's Reliability Coordinator, law enforcement, or other governmental authority" needs to be clarified because it is a series of optional entities and not a requirement to send the event reports to each entity.

(2) We also recommend aligning the DOE event reporting process as close as possible to the NERC Event Analysis process, as the DOE OE-417 and the NERC Brief Report requires limited information. In addition to aligning the standard, we recommend working

with DOE to clear up inconsistencies with terminology with the OE-417 Form, which uses the words “disturbance” and “incident” instead of “event.”

(3) The comment in section 3 regarding applying the definition of Load appears to be contradictory. On the one hand, it indicates that the standard should use the NERC definition of Load, but on the other hand it indicates that the definition is not adequate. If the definition is not adequate perhaps it should not apply. At the very least, if the definition is modified, all standards that use of the definition need to be reviewed to ensure that modification does not unintentionally change the meaning the proposed definition of Load that is used in other reliability standards.

**Response:**

The EOP PRT understands that there are efficiencies to be gained between ERO and ES-ISAC reporting; the EOP PRT will recommend that the future SDT review for compatibility. DOE reporting is outside the jurisdiction of NERC.

The intent of the EOP PRT was to review whether the glossary term “Load” should be used or to leave it as “load,” as currently written. The EOP PRT has discussed the term “load’ and will recommend review by the future SDT of the term “load” in EOP-004-2. The defined term “Load,” does not reconcile with the intent of the term “load” in the standard.

**Likes:** 0

**Dislikes:** 0

---

**Michelle D’Antuono - Oxy - Ingleside Cogeneration LP - 5 -**

Selected Answer: No



**Answer Comment:**

See comments to Question 2.

**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

---

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

## Selected Answer:

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

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

Selected Answer: Yes

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

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

Selected Answer:

**Answer Comment:**

**Response:**

Likes: 0

Dislikes: 0

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

Selected Answer: No

**Answer Comment:**

We disagree with the PRT recommendations in the Event Review Report in reference to the Clarity (#2) section a (page 4). They stated that the “relationship between the reporting requirements contained in the Standard and the Department of Energy OE-417 report is clear as written.” However, it also mentioned that EOP-004-2 is used in other jurisdictions outside of the United States. We would suggest listing the specific reporting forms for the other jurisdictions as well as the OE-417 so there is no confusion on what documentation should be used for reporting events no matter the jurisdictions. Also, we would recommend including the listing of reports in the Measurements where applicable to the appropriate RSAW(s).

In addition, we suggest the PRT review the language in R2 to ensure it is clear that the intent of either submitting the EOP-004 Attachment 1 form, or the OE-417 form is to avoid the need to double report. We understand that the intent is to file the OE-417 if applicable, and if not, then file the EOP-004 Attachment 1 form. But both are not necessary. This is understood, however is not clear in the language of the requirements.

**Response:**

The EOP PRT understands that there are efficiencies to be gained between ERO and ES-ISAC reporting; the EOP PRT will recommend that the future SDT review for compatibility. DOE reporting is outside the jurisdiction of NERC.

The EOP PRT will recommend in the SAR for the future drafting team to review recommendations based on the comments received for Attachment 1, but will not suggest specific rewrites. The EOP PRT believes all recommendations have merit and need a thorough review by the future SDT when formed for this standard.

**Likes:** 3 OGE Energy - Oklahoma Gas and Electric Co., 3, Hargrove Donald  
OGE Energy - Oklahoma Gas and Electric Co., 5, Staples Leo  
OGE Energy - Oklahoma Gas and Electric Co., 1, Pyle Terri

**Dislikes:** 0

---

**Jared Shakespeare - Peak Reliability - 1 -**

**Selected Answer:** No

**Answer Comment:**

**R3:** We disagree with the PRT's reason and agree with the IERP recommendation to retire R3. Contact lists are administrative in nature and should not be part of a mandatory reliability standard. There is no evidence that not having a contact list has caused additional burden to operators. Further the PRT explanation (p3) states that R3 has a VRF of high. R3 has a VRF of medium. We agree with the rest of the PRT revision comments for EOP-004-2.

**Response:**

With regard to R3, many individuals disagreed with the EOP PRT recommendation not to retire R3. The EOP PRT has been persuaded for the reasons listed in the Summary above, and now agrees to recommend retirement of Requirement R3. Retirement of Requirement R3 resolves any issues related to VRF designations related to Requirement R3.

**Likes:** 0

**Dislikes:** 0

---

**Donald Hargrove - OGE Energy - Oklahoma Gas and Electric Co. - 3 -**

Selected Answer:

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

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**Ben Li - Independent Electricity System Operator - 2 - NPCC**

Selected Answer: Yes

**Answer Comment:**

**We agree with Recommendation 2(b) to improve the clarity for the VSL for Requirement R2 by adding “recognition of” to the threshold of VSL table for Requirement R2 to provide the needed consistency between the requirement and the measure. Absent this phrase, some entities have been found potentially non-compliant with Requirement R2 when these entities did not report the events within 24 hours of their occurrence despite the reporting was made within 24 hours of recognizing that such events met the event type threshold for reporting.**

**Response:** The EOP PRT thanks you for your support.

**Likes:** 0

**Dislikes:** 0

---

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

**Selected Answer:** Yes

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

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

**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

---

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

Selected Answer:

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

**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:

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

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

Selected Answer: Yes

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

**4. If you have any other comments that you have not already mentioned above, on the Periodic Review recommendation, please state it specifically for EOP-004-2.**

**Summary:** The EOP PRT will recommend in the SAR for the future drafting team to review recommendations based on the comments received for Attachment 1, but will not suggest specific rewrites. The EOP PRT believes all recommendations have merit and need a thorough review by the future SDT when formed for this standard.

With regard to R3, many individuals disagreed with the EOP PRT recommendation not to retire R3. The EOP PRT has been persuaded for the reasons listed in the Summary above, and now agrees to recommend retirement of Requirement R3. Retirement of Requirement R3 resolves any issues related to VRF designations related to Requirement R3.

The EOP PRT appreciates your comments. In support of comments received, the EOP PRT will recommend for the future drafting team to include additional information in the Guideline and Technical Basis regarding the good practice of physically and digitally surveying control houses following a breach.

The intent of the EOP PRT was to review whether the glossary term "Load" should be used or to leave it as "load," as currently written. The EOP PRT has discussed the term "load" and will recommend review by the future SDT of the term "load" in EOP-004-2. The defined term "Load," does not reconcile with the intent of the term load in the standard.

The EOP PRT understands that there are efficiencies to be gained between ERO and ES-ISAC reporting; the EOP PRT will recommend that the future SDT review for compatibility. DOE reporting is outside the jurisdiction of NERC.

How various regions support the submission of data is up to their region; therefore, it should be noted that while having the Reliability Coordinator submit only for one region will work, it may not work for other regions. The EOP PRT will recommend to the future SDT to review the need to clarify that not all entities have to report an event.

The EOP PRT will recommend that the future SDT take into account regional differences when reviewing the standard.

The EOP PRT notes that revisions to IRO-009 are beyond the scope of the EOP-004-2 periodic review.

The EOP PRT maintains that it is good practice to evaluate if retention periods still apply based on recommended changes by the EOP PRT and potentially implemented changes by the future SDT.

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

Selected Answer:

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

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**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer:

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

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

Selected Answer:

**Answer Comment:** N/A

**Response:**

**Likes:** 0

**Dislikes:** 0

**Leonard Kula - Independent Electricity System Operator - 2 -**

Selected Answer:

**Answer Comment:****Response:****Likes:** 0**Dislikes:** 0

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

## Selected Answer:

**Answer Comment:**

Hydro-Quebec TranEnergie request that the NERC Drafting Team reconsider the generation loss value from 1,000 MW to 2,000 MW for the Québec Interconnection at the attachment 2 of Generation Loss.

See technical justification attached.

**Response:**

The EOP PRT will recommend in the SAR for the future drafting team to review recommendations based on the comments received for Attachment 1, but will not suggest specific rewrites. The EOP PRT believes all recommendations have merit and need a thorough review by the future SDT when formed for this standard.

**Likes:** 0**Dislikes:** 0

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

Selected Answer:

**Answer Comment:**

The NSRF is recommending the follow change: page 3, second to last paragraph, last sentence, replace *emergency* with *after the fact operations*.

**Response:**

With regard to R3, many individuals disagreed with the PRT recommendation not to retire R3. The EOP PRT has been persuaded for the reasons listed in the Summary to Question 3, and now agrees to recommend retirement of R3.

**Likes:** 0

**Dislikes:** 0

**Kaleb Brimhall - Colorado Springs Utilities - 5 -**

Selected Answer:

**Answer Comment:**

No Comments.

**Response:**

**Likes:** 0

**Dislikes:** 0

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**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

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

Selected Answer:

**Answer Comment:**

**Response:**



Likes: 0

Dislikes: 0

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

Selected Answer:

**Answer Comment:**

**Add "Actual or Suspected Cyber Events" as an Event Type. With the increase threat on the industry of Cyber Attacks, we believe that this needs to be added as an Event Type in EOP-004-2. While Cyber Threats are included in the DOE-417 report, this type of event should also be captured in the NERC Standards.**

**Response:**

The EOP PRT will recommend in the SAR for the future drafting team to review recommendations based on the comments received for Attachment 1, but will not suggest specific rewrites. The EOP PRT believes all recommendations have merit and need a thorough review by the future SDT when formed for this standard.

Likes: 0

Dislikes: 0

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**David Jendras - Ameren - Ameren Services - 3 -**

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

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

Selected Answer:

**Answer Comment:**

**Response:**

Likes: 0

Dislikes: 0

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**Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC**

Selected Answer:

**Answer Comment:**

Requirement R3 is administrative, and should be a Paragraph 81 candidate.

Coordination with the Event Analysis Program is imperative if Categories being analyzed are to line-up with those being reported (notification) in EOP-004-2. The original intent was to do this so as to not burden nor confuse industry on what needs to be reported and analyzed. The Process Review team needs to coordinate with the Event Analysis Subcommittee to accomplish this task. This may have to be requested of the SC to correct the standard in order to realign the standard with the EA event categories.

**Response:**

With regard to Requirement R3, due to comments received, the EOP PRT has decided to recommend retirement of Requirement R3. Retirement of Requirement R3 resolves any issues related to VRF designations related to Requirement R3.

With regard to coordination with the Event Analysis Subcommittee, the EOP PRT notes that the members of the EAS and/or the subcommittee as a whole are encouraged to submit their comments to the future SDT.

Likes: 0

Dislikes: 0

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**Andrew Puzstai - American Transmission Company, LLC - 1 -**

Selected Answer:

**Answer Comment:**

- . The Periodic Review Team has not suggested revisions to the VRFs. ATC recommends that the Periodic Review Team evaluate the continued appropriateness of the VRFs. It is difficult to understand why Requirement # 1, which requires the implementation of an overall event Reporting Plan has a “low” VRF while Requirement # 3, which requires that contact information in the Reporting Plan be routinely updated, has a “medium” VRF.
- . EOP-004-2 introduces the term “Responsible Entity.” “Responsible Entity” is currently not defined in the NERC Glossary of Terms.
- . The Periodic Review Team has suggested that “additional information in the Guidance and Technical Basis regarding the good practice of physically and digitally surveying control houses following a breach.” ATC supports this as a “good practice” but the Guideline and Technical Basis section of any Reliability Standard is not an appropriate place to advocate “good practices.” This “good practice” also seems irrelevant to EOP-004-2 since this Standard is intended to only define event reporting obligations.
- The Periodic Review Team recommends the review of the term “load” as used in EOP-004-2 be evaluated by any future Standards Development Team. The Periodic Review Team has suggested that the use of the term “load ” should be applied as intended by the NERC Glossary defined term “ Load.” ATC does not believe that “load” as used in EOP-004-2 was intended to be applied as pursuant to the “Load” definition on the NERC Glossary of Terms.

**Response:**

With regard to Requirement R3, due to comments received, the EOP PRT has decided to recommend retirement of Requirement R3.

The EOP PRT will recommend in the SAR for the future drafting team to review recommendations based on the comments received for Attachment 1, but will not suggest specific rewrites. The EOP PRT believes all recommendations have merit and need a thorough review by the future SDT when formed for this standard.

The EOP PRT appreciates your comments. In support of comments received, the EOP PRT will recommend for the future drafting team to include additional information in the Guideline and Technical Basis regarding the good practice of physically and digitally surveying control houses following a breach.

The intent of the EOP PRT was to review whether the glossary term "Load" should be used or to leave it as "load," as currently written. The EOP PRT has discussed the term "load" and will recommend review by the future SDT of the term "load" in EOP-004-2. The defined term "Load," does not reconcile with the intent of the term "load" in the standard.

The EOP PRT understands that there are efficiencies to be gained between ERO and ES-ISAC reporting; the EOP PRT will recommend that the future SDT review for compatibility. DOE reporting is outside the jurisdiction of NERC.

**Likes:** 0

**Dislikes:** 0

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**Molly Devine - IDACORP - Idaho Power Company - 1 -**

Selected Answer:

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

---

**Mark Kenny - Northeast Utilities - 3 -**

Selected Answer:

**Answer Comment:**

Coordination with the Event analysis program is imperative if Categories being analyzed are to line-up with those being reported (notification) in EOP-004-2. Original intent was to do this so as to not burden nor confuse industry on what needs to be reported and analyzed. The Process Review team needs to coordinate with the Event Analysis Subcommittee to accomplish this task. This may have to be requested of the SC to correct the standard in order to realign the standard with the EA event categories.

Eversource Proposes that a future SDT consider revising the Event Type, Complete Loss of Monitoring capability description to not include mention of State Estimator or Contingency Analysis. Any clarification as to what the event is describing should be provided in a supplemental guidance document.

**Response:**

The EOP PRT understands that there are efficiencies to be gained between ERO and ES-ISAC reporting; the EOP PRT will recommend that the future SDT review for compatibility. DOE reporting is outside the jurisdiction of NERC.

The EOP PRT will recommend in the SAR for the future drafting team to review recommendations based on the comments received for Attachment 1, but will not suggest

specific rewrites. The EOP PRT believes all recommendations have merit and need a thorough review by the future SDT when formed for this standard.

**Likes:** 0

**Dislikes:** 0

---

**Ben Engelby - ACES Power Marketing - 6 -**

Selected Answer:

**Answer Comment:**

(1) We would like to point out that registered entities are required to submit duplicative event reports manually to both the DOE and NERC. We ask that the EOP PRT make a recommendation for NERC to resolve this duplication issue by coordinating with the DOE to have a portal to submit the Event Report that will copy all interested parties and regulators.

(2) Thank you for the opportunity to comment.

**Response:**

While it is agreed that the duplicative nature does exist, the OE-417 portal allows for the submission to NERC of its form.

The EOP PRT understands that there are efficiencies to be gained between ERO and ES-ISAC reporting; the EOP PRT will recommend that the future SDT review for compatibility. DOE reporting is outside the jurisdiction of NERC.

**Likes:** 0

**Dislikes:** 0

**Michelle D'Antuono - Oxy - Ingleside Cogeneration LP - 5 -**

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:**

SGE&G agrees with SERC OC comments

**Response:**

**Likes:** 0



**Dislikes:** 0

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

Selected Answer:

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

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

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

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

Selected Answer:

**Answer Comment:**

We suggest that an improvement to event reporting would be to consolidate the submission of EOP-004 forms or OE-417 events by only the RC to NERC/DOE rather than have separate reporting by multiple entities. This would streamline the process and would eliminate multiple, duplicate reports being provided. BA, TOP, etc reporting would be submitted to the RC and the RC would submit a consolidated, single report to DOE/NERC. We ask the PRT to discuss this concept. The intent of the suggested improvement is to clarify that "if" a BA or TOP is reporting the event to DOE/NERC, then the RC is not obligated to submit the same, matching report for the same event. If the event covers multiple TOP areas, for example, is there really a need for multiple event reports to be submitted? If a single event report can be submitted, then why can't a single report satisfy the intent?

The term 'load' is used throughout the standard (especially in attachment 1 and 2). We agree with the recommendation for the future SDT to capitalize the 'l' in load. This term should be capitalized as it is defined in both the Glossary of Terms as well as the Rules of Procedure (RoP).

**Response:**

The EOP PRT recommends review by the future SDT of the term "load" in EOP-004-2 reconcile with the intent of the term load in the standard.

The EOP PRT understands that there are efficiencies to be gained between ERO and ES-ISAC reporting; the EOP PRT will recommend that the future SDT review for compatibility. DOE reporting is outside the jurisdiction of NERC.

How various regions support the submission of data is up to their region; therefore, it should be noted that while having the Reliability Coordinator submit only for one region will work, it may not work for other regions. The EOP PRT will recommend to the future SDT to review the need to clarify that not all entities have to report an event.

The EOP PRT will recommend that the future SDT take into account regional differences when reviewing the standard.

**Likes:** 3 OGE Energy - Oklahoma Gas and Electric Co., 3, Hargrove Donald  
OGE Energy - Oklahoma Gas and Electric Co., 5, Staples Leo  
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

---

**Donald Hargrove - OGE Energy - Oklahoma Gas and Electric Co. - 3 -**

Selected Answer:

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

---

**Ben Li - Independent Electricity System Operator - 2 - NPCC**

Selected Answer:

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

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

Selected Answer:

**Answer Comment:**

Texas RE recommends reviewing the Guideline and Technical basis and the Background section as it references CIP-001-1a, which is retired. Texas RE noticed that the IRO-009 references the IROL violation report in EOP-004-1 but is not in EOP-004-2.

**Response:** The EOP PRT notes that revisions to IRO-009 are beyond the scope of the EOP-004-2 periodic review.

**Likes:** 0

**Dislikes:** 0

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

Selected Answer:

**Answer Comment:**

BPA supports the following recommendation under Definitions: Do any of the defined terms used within the Reliability Standard need to be refined?

Yes

The EOP PRT recommends review by the future SDT of the term “load” in EOP-004-2 and revise to “Load” if the future SDT determines “load” is intended to be the defined term “Load3,” and to review the term for conflict with applicable entity (Load is not a physical end use device, but the existence of the capability to deliver electric energy – MW reduction).

**Response:**

The intent of the EOP PRT was to review whether the glossary term “Load” should be used or to leave it as “load,” as currently written. The EOP PRT has discussed the term “load” and will recommend review by the future SDT of the term “load” in EOP-004-2. The defined term “Load,” does not reconcile with the intent of the term “load” in the standard.

**Likes:**

0

**Dislikes:**

0

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**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 maintains that it is good practice to evaluate if retention periods still apply based on recommended changes by the EOP PRT and potentially implemented changes by the future SDT.

**Likes:** 0

**Dislikes:** 0

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

Selected Answer:

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

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

Selected Answer:

**Answer Comment:**

SRP disagrees with the EOP PRT's recommendation to revise the term "load" to "Load". The interpretation of "Load" is not consistent with the definition in the NERC Glossary of Terms. If the PRT is recommending to adjust the definition in the NERC Glossary, that can

be pursued. However, SRP recommends refraining from creating a distinct definition for "Load" for this standard that differs from the definition in the NERC Glossary. Standard specific definitions lead to confusion of when to use the definition from the NERC Glossary and the definition in the standard.

**Response:**

The intent of the EOP PRT was to review whether the glossary term "Load" should be used or to leave it as "load," as currently written. The EOP PRT has discussed the term "load" and will recommend review by the future SDT of the term "load" in EOP-004-2. The defined term "Load," does not reconcile with the intent of the term "load" in the standard.

**Likes:**

0

**Dislikes:**

0

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**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:**

Thank you for your comment. The EOP PRT believes this comment refers to EOP-005, and not EOP-004.

**Likes:**

0

**Dislikes:**

0



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**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

---

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

Selected Answer:

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

## Additional Comments

Si Truc Phan  
Hydro-Quebec

### **Review of generation loss of the Québec Interconnection in the Periodic Review of Standard EOP-004**

#### **Objective:**

Request that the NERC Drafting Team change the generation loss value from 1,000 MW to 2,000 MW for the Québec Interconnection.

#### **History:**

The following information was retrieved from NERC's final petition to FERC for approval of [EOP-004-2](#).

1. "Reliability Standard [EOP-004-2](#) is a result of merging [EOP-004-1](#) and CIP-001-2a and represents a significant improvement in the identification and reporting of events. Successful event analysis depends on a collaborative approach in which registered entities, Regional Entities and NERC work together to achieve a common goal."

Our comprehension is that two existing standards were merged into the [EOP-004-2](#) standard.

2. “The DSR SDT has not modified this event since it is being maintained as it is presently enforceable within EOP-004-1.”

Our interpretation is that the DSR SDT should not have modified nor added new criteria to Attachment 1. Hydro-Québec was using the criteria of 2,000 MW established for the Eastern Interconnection.

In version 2 of the standard, the DSR SDT included the Québec Interconnection with the ERCOT Interconnection. Hydro-Québec believes this modification was a misconception between Quebec and ERCOT Interconnections or an initiative from the DSR SDT.

#### **Technical Justification:**

Hydro-Québec presents the following technical justification for reverting back to the value of 2,000 MW for the generation loss for the Québec Interconnection and for harmonizing with NERC EA process.

1. Generation in the Québec Interconnection is 95 % hydraulic. To be efficient, generation must operate within 80 % of its operating range. There is a large spinning reserve available at all time which aids in the recovery period after an event (ACE-Area Control Error). Historically, the recorded average ACE recovery time for a 2,000 MW loss is 5 minutes which is 3 times faster than the standard requirement of 15 minutes. [BAL-002-1a \(R4.2\)](#).
2. Based on the Hydro Québec’s generation loss reports, generation loss between 1,500 MW to 2,000 MW does not trig the first stage threshold of the UFLS scheme. The frequency stayed above the underfrequency limit.
3. In order to maintain the integrity of the Québec system, the RPTC SPS in Québec (Generation Rejection and Remote Load Shedding) is designed to detect abnormal or predetermined system conditions, to take corrective actions and to deliberately remove up to 1,500 MW of preselected generation from the power system. Consequently, the system is design to remain stable upon the instantaneous loss of 1,500 MW of generation. For Hydro-Québec, a generation loss of more than 2,000 MW is considered as an issue, which is make sense with previous 2,000 MW generation loss reporting requirement.
4. The EEA level 3 alert (EOP-002) in Québec is set generally set at 2,000 MW, based on the deficiency of operating reserves and margins. Up to now, no EEA level 3 alert has occurred in the Québec Interconnection.
5. Hydro Québec’s loss of generation in first contingency (n-1) is set around 2,000 MW.

#### **Conclusion:**

Hydro-Québec believes that the modification of the [EOP-004-2](#) standard is a misconception or initiative from the DSR SDT.

Hydro-Québec requests that the DSR SDT reconsider the original value of 2,000 MW for the generation loss reporting requirement for the Québec Interconnection in the next version of the EOP-004 standard.

Upon request, Hydro-Québec will provide additional information to NERC and/or SDT.

**Response:** Thank you for your comments and the provided technical justification. The EOP PRT will recommend in the SAR for the future drafting team to review recommendations based on the comments received for Attachment 1, but will not suggest specific rewrites. The EOP PRT believes all recommendations have merit and need a thorough review by the future SDT when formed for this standard.