

Consideration of Comments

Project Name: 2015-02 EOP Periodic Review | EOP-008-1

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	Shannon Fair	Colorado Springs Utilities	WECC	6
					Charlie Morgan	Colorado Springs Utilities	WECC	3
					Shannon Fair	Colorado Springs Utilities	WECC	6
					Kaleb Brimhall	Colorado Springs Utilities	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 Goyne	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
					Greg Campoli	NYISO	NPCC	2
					Ali Miremadi	CAISO	WECC	2
					Ben Li	IESO	NPCC	2
					Kathleen Goodman	ISO-NE	NPCC	2
					Mark Holman	PJM	RFC	2
					Terry Bilke	MISO	MRO	2
Emily Rousseau	MRO	1,2,3,4,5,6	MRO	MRO-NERC Standards Review Forum (NSRF)	Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
					Amy Casucelli	Xcel Energy	MRO	1,3,5,6
					Chuck Lawrence	American Transmission Company	MRO	1
					Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
					Dan Inman	Minnkota Power Cooperative, Inc	MRO	1,3,5,6

					Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
					Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
					Jodi Jenson	Western Area Power Administration	MRO	1,6
					Larry Heckert	Alliant Energy	MRO	4
					Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
					Marie Knox	Midwest ISO Inc.	MRO	2
					Mike Brytowski	Great River Energy	MRO	1,3,5,6
					Randi Nyholm	Minnesota Power	MRO	1,5
					Scott Nickels	Rochester Public Utilities	MRO	4
					Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
					Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
					Tony Eddleman	Nebraska Public Power District	MRO	1,3,5
Lee Pedowicz	Northeast Power Coordinating Council	10	NPCC	NPCC Proj 2015-02 EOP-008-1	Alan Adamson	New York State Reliability Council, LLC	NPCC	10
					David Burke	Orange and Rockland Utilities Inc.	NPCC	3
					Greg Campoli	New York Independent System Operator	NPCC	2
					Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
					Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1

					Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
					Kathleen Goodman	ISO - New England	NPCC	2
					Mark Kenny	Northeast Utilities	NPCC	1
					Helen Lainis	Independent Electricity System Operator	NPCC	2
					Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
					Paul Malozewski	Hydro One Networks Inc.	NPCC	1
					Bruce Metruck	New York Power Authority	NPCC	6
					Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
					Robert Pellegrini	The United Illuminating Company	NPCC	1
					Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
					David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5
					Brian Robinson	Utility Services	NPCC	8
					Wayne Sipperly	New York Power Authority	NPCC	5
					Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
					Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
					Michael Jones	National Grid	NPCC	1

					Brian Shanahan	National Grid	NPCC	1
					Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
					Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
					Glen Smith	Entergy Services, Inc.	NPCC	5
					Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
					Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
					RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
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

1. The EOP PRT's initial recommendation outlines a clarifying revision to EOP-008-1. Do you agree with the EOP PRT's recommended revision? If not, please explain specifically what aspects of the recommendation you disagree with.

Summary:

The EOP PRT is recommending that the future SDT revise Requirement R1.1 to provide clarity, as it would be difficult to establish a timing requirement to restore primary control center functionality given the range of events that could render the primary control center inoperable.

The standard will not substantively change; rather, it will be put into a Results-based template.

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

Jeff Wells - Grand River Dam Authority - 3 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Leonard Kula - Independent Electricity System Operator - 2 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

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

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

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

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Kaleb Brimhall - Colorado Springs Utilities - 5 -

Selected Answer: No

Answer Comment:

R1.1 – CSU does not understand the need to revise this sub-requirement. CSU believes it is clear as written.

Response:

The EOP PRT is recommending that the future SDT revise Requirement R1.1 to provide clarity, as it would be difficult to establish a timing requirement to restore primary control center functionality given the range of events that could render the primary control center inoperable.

Likes: 0

Dislikes: 0

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

Selected Answer: No

Answer Comment:

Dominion believes that the EOP PRT is asking that the SDT to introduce a specific time requirement to be contained in R1.1. We do not agree, believing that the current standard leaves that determination to the entity based upon its specific circumstance; based to a large extent, on its relationships with other entities (especially those that can provide some level of oversight or monitoring of the affected entity area).

Response:

The EOP PRT is recommending that the future SDT revise Requirement R1.1 to provide clarity, as it would be difficult to establish a timing requirement to restore primary control center functionality given the range of events that could render the primary control center inoperable.

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

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

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

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

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

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

Selected Answer: No

Answer Comment: Final_Comment_Report_EOP0081_March_2015_ercot.docx

Response: The EOP PRT is recommending that the future SDT revise Requirement R1.1 to provide clarity, as it would be difficult to establish a timing requirement to restore primary control center functionality given the range of events that could render the primary control center inoperable.

Likes: 0

Dislikes: 0

Molly Devine - IDACORP - Idaho Power Company - 1 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC

Selected Answer: Yes

Answer Comment:

Agree.

Item b.--Agree.

Item c.--Agree.

The current language is clear: backup functionality to operate the power system is required for the amount of time that it takes to restore the primary control center functionality.

Response:

The EOP PRT is recommending that the future SDT revise Requirement R1.1 to provide clarity, as it would be difficult to establish a timing requirement to restore primary control center functionality given the range of events that could render the primary control center inoperable.

Likes: 0

Dislikes: 0

Mark Kenny - Northeast Utilities - 3 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

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

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Ben Engelby - ACES Power Marketing - 6 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

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

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

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

Selected Answer: Yes

Answer Comment:

We support the clarifying change to R1.1. It seems to streamline the intent of the requirement. Though perhaps the PRT could elaborate further on their thinking behind making this change as the intent of the change may be misunderstood.

Response:

The EOP PRT is recommending that the future SDT revise Requirement R1.1 to provide clarity, as it would be difficult to establish a timing requirement to restore primary control center functionality given the range of events that could render the primary control center inoperable.

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

Dislikes: 0

Jared Shakespeare - Peak Reliability - 1 -

Selected Answer: Yes

Answer Comment:

R1.1 Agree with the PRT recommendation of striking "...for the time it takes to restore the primary control center functionality."

Response: Thank you for your comment.

Likes: 0

Dislikes: 0

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

Selected Answer: No

Answer Comment: Texas RE agrees that R1.1 should be clarified but striking the language does not provide enough clarity.

Response: The EOP PRT is recommending that the future SDT revise Requirement R1.1 to provide clarity, as it would be difficult to establish a timing requirement to restore primary control center functionality given the range of events that could render the primary control center inoperable.

Likes: 0

Dislikes: 0

Ben Li - Independent Electricity System Operator - 2 - NPCC

Selected Answer: No

Answer Comment:

We believe that the current language is clear: backup functionality to operate the power system is required for the amount of time that it takes to restore the primary control center functionality.

Response:

The EOP PRT is recommending that the future SDT revise Requirement R1.1 to provide clarity, as it would be difficult to establish a timing requirement to restore primary control center functionality given the range of events that could render the primary control center inoperable.

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

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

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

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Rick Applegate - Tacoma Public Utilities (Tacoma, WA) - 6 -

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

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

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

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

Selected Answer: No

Answer Comment:

SRP cannot support a revision of the standard without knowing the specifics of what is to be revised and what it is to be revised to. Attachment 1 serves as a guideline to determine if the Reliability Standard should be converted to the results-based standards format. It does not indicate what will be converted or what it would be converted to.

Response: Thank you for your comment. The standard will not substantively change; rather, it will be put into a Results-based template.

Likes: 0

Dislikes: 0

2. Do you agree with the initial recommendation of the EOP PRT regarding EOP-008-1? If not, please explain specifically what aspects of the recommendation you disagree with.

Summary:

The EOP PRT is recommending that the future SDT revise Requirement R1.1 to provide clarity, as it would be difficult to establish a timing requirement to restore primary control center functionality given the range of events that could render the primary control center inoperable.

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**Jeff Wells - Grand River Dam Authority - 3 -**

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Leonard Kula - Independent Electricity System Operator - 2 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

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

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

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

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Kaleb Brimhall - Colorado Springs Utilities - 5 -

Selected Answer: No

Answer Comment:

R1.1 – CSU does not understand the need to revise this sub-requirement. CSU believes it is clear as written.

Response:

The EOP PRT is recommending that the future SDT revise Requirement R1.1 to provide clarity, as it would be difficult to establish a timing requirement to restore primary control center functionality given the range of events that could render the primary control center inoperable.

Likes: 0

Dislikes: 0

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

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Thomas Foltz - AEP - 5 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Brian Bartos - CPS Energy - 3 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

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

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

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

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

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

Selected Answer: No

Answer Comment: Final_Comment_Report_EOP0081_March_2015_ercot.docx

Response: Please see response below.

Likes: 0

Dislikes: 0

Molly Devine - IDACORP - Idaho Power Company - 1 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC

Selected Answer: Yes

Answer Comment:

See the response to Question 1 above.

Response:

Please see response in Question 1 above.

Likes:

0

Dislikes:

0

Mark Kenny - Northeast Utilities - 3 -

Selected Answer:

Yes

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

0

Dislikes:

0

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

Selected Answer:

Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Ben Engelby - ACES Power Marketing - 6 -

Selected Answer: Yes

Answer Comment:
We agree that EOP-008-1 should be revised.

Response: Thank you for your comment.

Likes: 0

Dislikes: 0

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

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

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

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Jared Shakespeare - Peak Reliability - 1 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

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

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Ben Li - Independent Electricity System Operator - 2 - NPCC

Selected Answer: No

Answer Comment:

See answer to question 1 above.

Response:

Please see response in Question 1 above.

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

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

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

Selected Answer: Yes

Answer Comment:

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

Response: The EOP PRT posted for comment the team's initial recommendations. The next posting will be the final recommendations of the team after considering all comments received on the initial recommendations. The EOP PRT was tasked with reviewing the standards and developing recommendations.

Likes: 0

Dislikes: 0

Rick Applegate - Tacoma Public Utilities (Tacoma, WA) - 6 -

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

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

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

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

Selected Answer: No

Answer Comment:

The revision for R1, Part 1.1 appears to be gramatical in nature. It is unclear what the reasonings are for revisions to EOP-008-1. SRP does not see any other specifics in the recomendation for a revision.

Response:

The EOP PRT is recommending that the future SDT revise Requirement R1.1 to provide clarity, as it would be difficult to establish a timing requirement to restore primary control center functionality given the range of events that could render the primary control center inoperable.

Likes: 0

Dislikes: 0

3. If you have any other comments that you have not already mentioned above, on the Periodic Review recommendation, please state it specifically for EOP-008-1.

Summary:

The EOP PRT considered the recommendations of the IERP when reviewing the requirements for retirement. The IERP determined in their final report that, although Requirement R5 may have administrative aspects, it is important for reliability to have an updated Operating Plan for backup functionality.

The EOP PRT will recommend that the future SDT consider a guideline and technical basis section be developed in EOP-008.

The EOP PRT will recommend to the future SDT a review of EOP-008 for grammar, punctuation, and syntax edit revisions.

The EOP PRT does not agree that the reference to power source(s) is unclear in Requirement R1.2.4. Requirement R1.2.4 is intended to be either singular or plural and is dependent on the entity's power installation at their facility, and does not require redundant power sources.

The EOP PRT does not recommend revision to Requirement R2, as "electronic and hard copy," are stated in Measure M2. The suggested change the EOP PRT is recommending to the future SDT for EOP-005, Measure M5 is comparable with the other measures dealing with electronic and hard copy format.

The EOP PRT team does not recommend that Requirement 8 include a notification to affected entities; and that notification of the RC is sufficient. Additionally, the EOP PRT supports that the six-month timeframe is not excessive, as this provides the entity flexibility to evaluate the extent of the loss of functionality.

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

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

John Fontenot - Bryan Texas Utilities - 1 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Jeff Wells - Grand River Dam Authority - 3 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Leonard Kula - Independent Electricity System Operator - 2 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

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

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

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

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Kaleb Brimhall - Colorado Springs Utilities - 5 -

Selected Answer:

Answer Comment: No Comments

Response:

Likes: 0

Dislikes: 0

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

Selected Answer:

Answer Comment:

The IERP (from this [link](http://www.nerc.com/pa/Stand/Pages/Standards-Under-Development.aspx) (http://www.nerc.com/pa/Stand/Pages/Standards-Under-Development.aspx), select P81 and IERP Recommendations for Retirement), this includes R5 (P81), yet question 1 for the SME is marked "No". Please explain.

Response:

The EOP PRT considered the recommendations of the IERP when reviewing the requirements for retirement. The IERP determined in their final report that, although Requirement R5 may have administrative aspects, it is important for reliability to have an updated Operating Plan for backup functionality.

Likes: 0

Dislikes: 0

Thomas Foltz - AEP - 5 -

Selected Answer:

Answer Comment:

While AEP does not object to the review of the standard for grammar, punctuation, syntax, etc., we would caution the team to not intentionally or unintentionally change the meaning of the standard or requirements to this recently vetted standard.

Response: Thank you for your comment.

Likes: 0

Dislikes: 0

Brian Bartos - CPS Energy - 3 -

Selected Answer:

Answer Comment:**Response:****Likes:** 0**Dislikes:** 0**Joel Wise - Tennessee Valley Authority - 1,3,5,6 - SERC**

Selected Answer:

Answer Comment:**Response:****Likes:** 0**Dislikes:** 0**Nick Vtyurin - Manitoba Hydro - 1,3,5,6 - MRO**

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

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

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Molly Devine - IDACORP - Idaho Power Company - 1 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Mark Kenny - Northeast Utilities - 3 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

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

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Ben Engelby - ACES Power Marketing - 6 -

Selected Answer:

Answer Comment:

(1) The standard lacks a guideline and technical basis section. The section should elaborate on the meaning of “annual” and “annually,” as well as provide guidance on instances when backup functionality takes longer than two hours to implement.

(2) Thank you for the opportunity to comment.

Response:

The EOP PRT will recommend that the future SDT consider a guideline and technical basis section be developed in EOP-008.

Likes: 0

Dislikes: 0

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

Selected Answer:

Answer Comment:**Response:**

Likes: 0

Dislikes: 0

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

Selected Answer:

Answer Comment:

We would suggest capitalizing the term 'control center' in sub-parts of 1.5, 1.6 of Requirement R1, Requirement R2, Requirement R3, Requirement R4, Requirement R6, and sub-part 7.1 of Requirement R7. Also, we would suggest the PRT review the use of the term 'facility' in Requirement R3 when describing control centers and backup control centers or "sites where backup functionality is located". In some cases it may be appropriate to just remove the word "facility". For example remove it after the phrase "control center" in the first sentence of R1. The use of the phrase "control center facility" could lead to different interpretations.

Response: The EOP PRT will recommend to the future SDT a review of EOP-008 for grammar, punctuation, and syntax edit revisions.

The reference to Power source(s) in R1.2.4 seems to indicate an inferred requirement for a backup facility to have redundant power sources. Whatever the intent, it is unclear. All of the other sub-requirements of R1 are explicitly required to be capabilities or tools that are required. Redundant power sources is not mentioned in any other requirement. We suggest the PRT review R1.2.4 for clarity.

Response: The EOP PRT does not agree that the reference to power source(s) is unclear in Requirement R1.2.4. Requirement R1.2.4 is intended to be either singular or plural and is dependent on the entity's power installation at their facility, and does not require redundant power sources.

In R2 we would like to see a change to clarify that the availability of the Operating Plan for the backup functionality can be available in hard copy or electronic copy at the primary and backup sites. This would be similar to proposed changes in EOP-005-2 and EOP-006-2.

Response: The EOP PRT does not recommend revision to Requirement R2, as “electronic and hard copy,” are stated in Measure M2. The suggested change the EOP PRT is recommending to the future SDT for EOP-005, Measure M5 is comparable with the other measures dealing with electronic and hard copy format.

Response:

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

Dislikes: 0

Jared Shakespeare - Peak Reliability - 1 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

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

Selected Answer:

Answer Comment:

Texas RE is concerned that the standard does not require a notification to affected entities when a Reliability Coordinator, Balancing Authority, and Transmission Operator has experienced a loss of its primary or backup functionality and that anticipates that the loss of primary or backup functionality will last for more than six calendar months. In addition, Texas RE believes that allowing an entity up to six calendar months to provide a plan to its Regional Entity when the functionality is lost, is excessive. Texas RE recommends the "Compliance Monitoring Process" section be consistent with other Standards being reviewed.

Response:

The EOP PRT team does not recommend that Requirement 8 include a notification to affected entities; and that notification of the RC is sufficient. Additionally, the EOP PRT supports that the six-month timeframe is not excessive, as this provides the entity flexibility to evaluate the extent of the loss of functionality.

Likes: 0

Dislikes: 0

Ben Li - Independent Electricity System Operator - 2 - NPCC

Selected Answer:

Answer Comment:**Response:**

Likes: 0

Dislikes: 0

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

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

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

Selected Answer:

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

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

Selected Answer:

Answer Comment:

None.

Response:

Likes: 0

Dislikes: 0

Rick Applegate - Tacoma Public Utilities (Tacoma, WA) - 6 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

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

Selected Answer:

Answer Comment:

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

Response: Please see responses in EOP-005 regarding unique tasks.

Likes: 0

Dislikes: 0

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

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

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

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Additional Comments

Christina Bigelow
ERCOT

1. The EOP PRT's initial recommendation outlines a clarifying revision to EOP-008-1. Do you agree with the EOP PRT's recommended revision? If not, please explain specifically what aspects of the recommendation you disagree with.

Yes

No

Comments:

ERCOT believes that the current language is clear: backup functionality to operate the power system is required for the amount of time that it takes to restore the primary control center functionality. Where back up functionality differs over the transition period and the longer-term restoration period, the absence of specificity could cause confusion. ERCOT cannot support the EOP PRT's initial recommendation.

2. Do you agree with the initial recommendation of the EOP PRT regarding EOP-008-1? If not, please explain specifically what aspects of the recommendation you disagree with.

Yes

No

Comments:

ERCOT reiterates its comments provided in response to Question 1 above.

