

**Note: an Interpretation cannot be used to change a standard.**

Request for an Interpretation of a Reliability Standard	
Date submitted:	September 29, 2009
Date accepted:	October 5, 2009
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<b>Identify the standard that needs clarification:</b>	
<b>Standard Number (include version number):</b>	EOP-005-1
<b>Standard Title:</b>	System Restoration Plans
<b>Identify specifically what requirement needs clarification:</b>	
<b>Requirement Number and Text of Requirement:</b>	
R7. Each Transmission Operator and Balancing Authority shall verify the restoration procedure by actual testing or by simulation.	
<b>Clarification needed:</b>	
What is meant by the phrase "verify the restoration procedure" and by the term "simulation" in requirement R7?	
For a TOP without any blackstart facilities in its restoration plan, can exercises and tabletop drills be used to meet Requirement R7 by "verifying the restoration procedure" through tabletop "simulations?"	
<b>Background:</b>	
The phrase "verify the restoration procedure" can be interpreted in at least two ways:	
1) to verify the actual procedure, e.g., step by step process of who to call, what actions to take, etc., in other words, verify the procedure through tabletop drills or the like; or	
2) to verify the technical feasibility of the procedure, e.g., is the restoration plan technically feasible.	
The word "simulation" can also be interpreted in at least two ways.	

One way is as defined in the NERC Blackout Report (“August 14, 2003 Blackout NERC Actions to Prevent and Mitigate the Impacts of Future Cascading Blackouts”, February 10, 2004, page 10, footnote 5) for “realistic simulations”: “(t)he term ‘realistic simulations’ includes a variety of tools and methods that present operating personnel with situations to improve and test diagnostic and decision-making skills in an environment that resembles expected conditions during a particular type of system emergency. Although a full replica training simulator is one approach, lower cost alternatives such as PC-based simulators, tabletop drills, and simulated communications can be effective training aids if used properly”.

A second way of interpreting “simulation” is power flow studies and dynamic stability studies.

For small Transmission Operators (TOPs) (e.g., one substation), it seems that exercises and tabletop drills are sufficient to meet the reliability-related intent of Requirement R7 of the standard – which is to “verify” the TOP’s restoration procedure. The system restoration plan of these small TOPs is to wait for the large neighboring utility to restore themselves and then to connect to them and restore power one distribution circuit at a time. We believe that for such a case, power flow analysis and stability studies are not necessary since the total load of each distribution circuit is quite small in comparison to the large neighboring TOP’s system, and we know that the Ferranti Effect will be de minimis since they are connected by short lines at voltages 230 kV and below.

Similarly, for a TOP with a system restoration plan that includes one or more black start components, it seems that stability simulations would be expected to verify the TOP’s restoration procedure since a system starting from black will be vulnerable to instability. It is also understandable for the case of black start to simulate power flow due to high voltages caused by the Ferranti Effect. The Measures of the standard specifically refer to black-start and the cranking path and do not address another type of restoration plan.

**Identify the material impact associated with this interpretation:**

**Identify the material impact to your organization or others caused by the lack of clarity or an incorrect interpretation of this standard.**

The material impact is that small TOPs need to know if drills and exercises to simulate the restoration plan are sufficient in meeting this requirement. If power flow and stability studies are necessary for TOPs without blackout facilities in their restoration plans, these TOPs will need to allocate additional resources to perform these studies.