

The following table lists the Violation Risk Factors (VRFs) for the Version 0 Emergency Operations standards requirements. These VRFs are the weighted average of the stakeholder VRF selections from the second posting of the VRF Survey.

**VIOLATION RISK FACTORS – VERSION 0 STANDARDS PRE-BALLOT MATRIX**

<b>Standard Number</b>	<b>Requirement Number</b>	<b>Requirement</b>	<b>Violation Risk Factor</b>
EOP-001-0	R1.	Balancing Authorities shall have operating agreements with adjacent Balancing Authorities that shall, at a minimum, contain provisions for emergency assistance, including provisions to obtain emergency assistance from remote Balancing Authorities.	HIGH
EOP-001-0	R2.	The Transmission Operator shall have an emergency load reduction plan for all identified IROLs. The plan shall include the details on how the Transmission Operator will implement load reduction in sufficient amount and time to mitigate the IROL violation before system separation or collapse would occur. The load reduction plan must be capable of being implemented within 30 minutes.	MEDIUM
EOP-001-0	R3.	Each Transmission Operator and Balancing Authority shall:	MEDIUM
EOP-001-0	R3.1.	Develop, maintain, and implement a set of plans to mitigate operating emergencies for insufficient generating capacity.	MEDIUM
EOP-001-0	R3.2.	Develop, maintain, and implement a set of plans to mitigate operating emergencies on the transmission system.	MEDIUM
EOP-001-0	R3.3.	Develop, maintain, and implement a set of plans for load shedding.	MEDIUM
EOP-001-0	R3.4.	Develop, maintain, and implement a set of plans for system restoration.	MEDIUM
EOP-001-0	R4.	Each Transmission Operator and Balancing Authority shall have emergency plans that will enable it to mitigate operating emergencies. At a minimum, Transmission Operator and Balancing Authority emergency plans shall include:	MEDIUM
EOP-001-0	R4.1.	Communications protocols to be used during emergencies.	MEDIUM
EOP-001-0	R4.2.	A list of controlling actions to resolve the emergency. Load reduction, in sufficient quantity to resolve the emergency within NERC-established timelines, shall be one of the controlling actions.	MEDIUM
EOP-001-0	R4.3.	The tasks to be coordinated with and among adjacent Transmission Operators and Balancing Authorities.	MEDIUM
EOP-001-0	R4.4.	Staffing levels for the emergency.	MEDIUM
EOP-001-0	R5.	Each Transmission Operator and Balancing Authority shall include the applicable elements in Attachment 1-EOP-001-0 when developing an emergency plan.	MEDIUM
EOP-001-0	R6.	The Transmission Operator and Balancing Authority shall annually review and update each emergency plan. The Transmission Operator and Balancing Authority shall provide a copy of its updated emergency plans to its Reliability Coordinator and to neighboring Transmission Operators and Balancing Authorities.	MEDIUM

<b>Standard Number</b>	<b>Requirement Number</b>	<b>Requirement</b>	<b>Violation Risk Factor</b>
EOP-001-0	R7.	The Transmission Operator and Balancing Authority shall coordinate its emergency plans with other Transmission Operators and Balancing Authorities as appropriate. This coordination includes the following steps, as applicable:	MEDIUM
EOP-001-0	R7.1.	The Transmission Operator and Balancing Authority shall establish and maintain reliable communications between interconnected systems.	MEDIUM
EOP-001-0	R7.2.	The Transmission Operator and Balancing Authority shall arrange new interchange agreements to provide for emergency capacity or energy transfers if existing agreements cannot be used.	MEDIUM
EOP-001-0	R7.3.	The Transmission Operator and Balancing Authority shall coordinate transmission and generator maintenance schedules to maximize capacity or conserve the fuel in short supply. (This includes water for hydro generators.)	MEDIUM
EOP-001-0	R7.4.	The Transmission Operator and Balancing Authority shall arrange deliveries of electrical energy or fuel from remote systems through normal operating channels.	MEDIUM
EOP-002-0	R1.	Each Balancing Authority and Reliability Coordinator shall have the responsibility and clear decision-making authority to take whatever actions are needed to ensure the reliability of its respective area and shall exercise specific authority to alleviate capacity and energy emergencies.	HIGH
EOP-002-0	R2.	Each Balancing Authority and Reliability Coordinator shall implement its capacity and energy emergency plan, when required and as appropriate, to reduce risks to the interconnected system.	MEDIUM
EOP-002-0	R3.	A Balancing Authority that is experiencing an operating capacity or energy emergency shall communicate its current and future system conditions to its Reliability Coordinator and neighboring Balancing Authorities.	MEDIUM
EOP-002-0	R4.	A Reliability Coordinator that is experiencing an operating capacity or energy emergency shall communicate its current and future system conditions to neighboring areas.	MEDIUM
EOP-002-0	R5.	A Balancing Authority anticipating an operating capacity or energy emergency shall perform all actions necessary including bringing on all available generation, postponing equipment maintenance, scheduling interchange purchases in advance, and being prepared to reduce firm load.	MEDIUM
EOP-002-0	R6.	A deficient Balancing Authority shall only use the assistance provided by the Interconnection's frequency bias for the time needed to implement corrective actions. The Balancing Authority shall not unilaterally adjust generation in an attempt to return Interconnection frequency to normal beyond that supplied through frequency bias action and Interchange Schedule changes. Such unilateral adjustment may overload transmission facilities.	MEDIUM
EOP-002-0	R7.	If the Balancing Authority cannot comply with the Control Performance and Disturbance Control Standards, then it shall immediately implement remedies to do so. These remedies include, but are not limited to:	HIGH

<b>Standard Number</b>	<b>Requirement Number</b>	<b>Requirement</b>	<b>Violation Risk Factor</b>
EOP-002-0	R7.1.	Loading all available generating capacity.	HIGH
EOP-002-0	R7.2.	Deploying all available operating reserve.	HIGH
EOP-002-0	R7.3.	Interrupting interruptible load and exports.	HIGH
EOP-002-0	R7.4.	Requesting emergency assistance from other Balancing Authorities.	HIGH
EOP-002-0	R7.5.	Declaring an Energy Emergency through its Reliability Coordinator; and	HIGH
EOP-002-0	R7.6.	Reducing load, through procedures such as public appeals, voltage reductions, curtailing interruptible loads and firm loads.	HIGH
EOP-002-0	R8.	Once the Balancing Authority has exhausted the steps listed in Requirement 7, or if these steps cannot be completed in sufficient time to resolve the emergency condition, the Balancing Authority shall:	HIGH
EOP-002-0	R8.1.	Manually shed firm load without delay to return its ACE to zero; and	HIGH
EOP-002-0	R8.2.	Request the Reliability Coordinator to declare an Energy Emergency Alert in accordance with Attachment 1-EOP-002-0 "Energy Emergency Alert Levels."	HIGH
EOP-002-0	R9.	A Reliability Coordinator that has any Balancing Authority within its Reliability Coordinator area experiencing a potential or actual Energy Emergency shall initiate an Energy Emergency Alert as detailed in Attachment 1-EOP-002-0 "Energy Emergency Alert Levels." The Reliability Coordinator shall act to mitigate the emergency condition, including a request for emergency assistance if required.	HIGH
EOP-002-0	R10.	When a Transmission Service Provider expects to elevate the transmission service priority of an Interchange Transaction from Priority 6 (Network Integration Transmission Service from Non-designated Resources) to Priority 7 (Network Integration Transmission Service from designated Network Resources) as permitted in its transmission tariff (See Attachment 1-IRO-006-0 "Transmission Loading Relief Procedure" for explanation of Transmission Service Priorities):	HIGH
EOP-002-0	R10.1.	The deficient Load-Serving Entity shall request its Reliability Coordinator to initiate an Energy Emergency Alert in accordance with Attachment 1-EOP-002-0.	HIGH
EOP-002-0	R10.2.	The Reliability Coordinator shall submit the report to NERC for posting on the NERC Website, noting the expected total MW that may have its transmission service priority changed.	HIGH
EOP-002-0	R10.3.	The Reliability Coordinator shall use EEA 1 to forecast the change of the priority of transmission service of an Interchange Transaction on the system from Priority 6 to Priority 7.	LOWER
EOP-002-0	R10.4.	The Reliability Coordinator shall use EEA 2 to announce the change of the priority of transmission service of an Interchange Transaction on the system from Priority 6 to Priority 7.	LOWER
EOP-003-0	R1.	After taking all other remedial steps, a Transmission Operator or Balancing Authority operating with insufficient generation or transmission capacity shall shed customer load rather than risk an uncontrolled failure of components or cascading outages of the Interconnection.	HIGH
EOP-003-0	R2.	Each Transmission Operator and Balancing Authority shall establish plans for automatic load shedding for underfrequency or undervoltage conditions.	HIGH

<b>Standard Number</b>	<b>Requirement Number</b>	<b>Requirement</b>	<b>Violation Risk Factor</b>
EOP-003-0	R3.	Each Transmission Operator and Balancing Authority shall coordinate load shedding plans among other interconnected Transmission Operators and Balancing Authorities.	HIGH
EOP-003-0	R4.	A Transmission Operator or Balancing Authority shall consider one or more of these factors in designing an automatic load shedding scheme: frequency, rate of frequency decay, voltage level, rate of voltage decay, or power flow levels.	HIGH
EOP-003-0	R5.	A Transmission Operator or Balancing Authority shall implement load shedding in steps established to minimize the risk of further uncontrolled separation, loss of generation, or system shutdown.	HIGH
EOP-003-0	R6.	After a Transmission Operator or Balancing Authority Area separates from the Interconnection, if there is insufficient generating capacity to restore system frequency following automatic underfrequency load shedding, the Transmission Operator or Balancing Authority shall shed additional load.	HIGH
EOP-003-0	R7.	The Transmission Operator and Balancing Authority shall coordinate automatic load shedding throughout their areas with underfrequency isolation of generating units, tripping of shunt capacitors, and other automatic actions that will occur under abnormal frequency, voltage, or power flow conditions.	HIGH
EOP-003-0	R8.	Each Transmission Operator or Balancing Authority shall have plans for operator-controlled manual load shedding to respond to real-time emergencies. The Transmission Operator or Balancing Authority shall be capable of implementing the load shedding in a timeframe adequate for responding to the emergency.	HIGH
EOP-004-0	R1.	Each Regional Reliability Organization shall establish and maintain a Regional reporting procedure to facilitate preparation of preliminary and final disturbance reports.	LOWER
EOP-004-0	R2.	A Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator or Load Serving Entity shall promptly analyze Bulk Electric System disturbances on its system or facilities.	MEDIUM
EOP-004-0	R3.	A Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator or Load Serving Entity experiencing a reportable incident shall provide a preliminary written report to its Regional Reliability Organization and NERC.	LOWER
EOP-004-0	R3.1.	The affected Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator or Load Serving Entity shall submit within 24 hours of the disturbance or unusual occurrence either a copy of the report submitted to DOE, or, if no DOE report is required, a copy of the NERC Interconnection Reliability Operating Limit and Preliminary Disturbance Report form. Events that are not identified until some time after they occur shall be reported within 24 hours of being recognized.	LOWER
EOP-004-0	R3.2.	Applicable reporting forms are provided in Attachments 022-1 and 022-2.	LOWER

Standard Number	Requirement Number	Requirement	Violation Risk Factor
EOP-004-0	R3.3.	Under certain adverse conditions, e.g., severe weather, it may not be possible to assess the damage caused by a disturbance and issue a written Interconnection Reliability Operating Limit and Preliminary Disturbance Report within 24 hours. In such cases, the affected Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, or Load Serving Entity shall promptly notify its Regional Reliability Organization(s) and NERC, and verbally provide as much information as is available at that time. The affected Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, or Load Serving Entity shall then provide timely, periodic verbal updates until adequate information is available to issue a written Preliminary Disturbance Report.	LOWER
EOP-004-0	R3.4.	If, in the judgment of the Regional Reliability Organization, after consultation with the Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, or Load Serving Entity in which a disturbance occurred, a final report is required, the affected Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, or Load Serving Entity shall prepare this report within 60 days. As a minimum, the final report shall have a discussion of the events and its cause, the conclusions reached, and recommendations to prevent recurrence of this type of event. The report shall be subject to Regional Reliability Organization approval.	LOWER
EOP-004-0	R4.	When a Bulk Electric System disturbance occurs, the Regional Reliability Organization shall make its representatives on the NERC Operating Committee and Disturbance Analysis Working Group available to the affected Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, or Load Serving Entity immediately affected by the disturbance for the purpose of providing any needed assistance in the investigation and to assist in the preparation of a final report.	LOWER
EOP-004-0	R5.	The Regional Reliability Organization shall track and review the status of all final report recommendations at least twice each year to ensure they are being acted upon in a timely manner. If any recommendation has not been acted on within two years, or if Regional Reliability Organization tracking and review indicates at any time that any recommendation is not being acted on with sufficient diligence, the Regional Reliability Organization shall notify the NERC Planning Committee and Operating Committee of the status of the recommendation(s) and the steps the Regional Reliability Organization has taken to accelerate implementation.	LOWER
EOP-005-0	R1.	Each Transmission Operator shall have a restoration plan to reestablish its electric system in a stable and orderly manner in the event of a partial or total shutdown of its system, including necessary operating instructions and procedures to cover emergency conditions, and the loss of vital telecommunications channels. Each Transmission Operator shall include the applicable elements listed in Attachment 1-EOP-005-0 in developing a restoration plan.	MEDIUM

<b>Standard Number</b>	<b>Requirement Number</b>	<b>Requirement</b>	<b>Violation Risk Factor</b>
EOP-005-0	R2.	Each Transmission Operator shall review and update its restoration plan at least annually and whenever it makes changes in the power system network, and shall correct deficiencies found during the simulated restoration exercises.	HIGH
EOP-005-0	R3.	Each Transmission Operator shall develop restoration plans with a priority of restoring the integrity of the Interconnection.	MEDIUM
EOP-005-0	R4.	Each Transmission Operator shall coordinate its restoration plans with Balancing Authorities within its area, its Reliability Coordinator, and neighboring Transmission Operators and Balancing Authorities.	MEDIUM
EOP-005-0	R5.	Each Transmission Operator and Balancing Authority shall periodically test its telecommunication facilities needed to implement the restoration plan.	MEDIUM
EOP-005-0	R6.	Each Transmission Operator and Balancing Authority shall train its operating personnel in the implementation of the restoration plan. Such training shall include simulated exercises, if practicable.	HIGH
EOP-005-0	R7.	Each Transmission Operator and Balancing Authority shall verify the restoration procedure by actual testing or by simulation.	HIGH
EOP-005-0	R8.	Each Transmission Operator shall ensure the availability and location of black start capability within its area to meet the needs of the restoration plan.	MEDIUM
EOP-005-0	R9.	Following a disturbance in which one or more areas of the Bulk Electric System become isolated or blacked out, the affected Transmission Operators and Balancing Authorities shall begin immediately to return the Bulk Electric System to normal.	HIGH
EOP-005-0	R9.1.	The affected Transmission Operators and Balancing Authorities shall work in conjunction with their Reliability Coordinator(s) to determine the extent and condition of the isolated area(s).	HIGH
EOP-005-0	R9.2.	The affected Transmission Operators and Balancing Authorities shall take the necessary actions to restore Bulk Electric System frequency to normal, including adjusting generation, placing additional generators online, or load shedding.	HIGH
EOP-005-0	R9.3.	The affected Balancing Authorities, working with their Reliability Coordinator(s), shall immediately review the Interchange Schedules between those Balancing Authority Areas or fragments of those Balancing Authority Areas within the separated area and make adjustments as needed to facilitate the restoration. The affected Balancing Authorities shall make all attempts to maintain the adjusted Interchange Schedules, whether generation control is manual or automatic.	HIGH
EOP-005-0	R9.4.	The affected Transmission Operators shall give high priority to restoration of off-site power to nuclear stations.	HIGH
EOP-005-0	R9.5.	The affected Transmission Operators may resynchronize the isolated area(s) with the surrounding area(s) when the following conditions are met:	HIGH
EOP-005-0	R9.5.1.	Voltage, frequency, and phase angle permit.	HIGH

<b>Standard Number</b>	<b>Requirement Number</b>	<b>Requirement</b>	<b>Violation Risk Factor</b>
EOP-005-0	R9.5.2.	The size of the area being reconnected and the capacity of the transmission lines effecting the reconnection and the number of synchronizing points across the system are considered.	HIGH
EOP-005-0	R9.5.3.	Reliability Coordinator(s) and adjacent areas are notified and Reliability Coordinator approval is given.	HIGH
EOP-005-0	R9.5.4.	Load is shed in neighboring areas, if required, to permit successful interconnected system restoration.	HIGH
EOP-006-0	R1.	Each Reliability Coordinator shall be aware of the restoration plan of each Transmission Operator in its Reliability Coordinator Area in accordance with NERC and regional requirements.	MEDIUM
EOP-006-0	R2.	The Reliability Coordinator shall monitor restoration progress and coordinate any needed assistance.	HIGH
EOP-006-0	R3.	The Reliability Coordinator shall have a Reliability Coordinator Area restoration plan that provides coordination between individual Transmission Operator restoration plans and that ensures reliability is maintained during system restoration events.	MEDIUM
EOP-006-0	R4.	The Reliability Coordinator shall serve as the primary contact for disseminating information regarding restoration to neighboring Reliability Coordinators and Transmission Operators or Balancing Authorities not immediately involved in restoration.	MEDIUM
EOP-006-0	R5.	Reliability Coordinators shall approve, communicate, and coordinate the re-synchronizing of major system islands or synchronizing points so as not to cause a Burden on adjacent Transmission Operator, Balancing Authority, or Reliability Coordinator Areas.	HIGH
EOP-006-0	R6.	The Reliability Coordinator shall take actions to restore normal operations once an operating emergency has been mitigated in accordance with its restoration plan.	MEDIUM
EOP-007-0	R1.	[High only because of R 1.2's importance.] Each Regional Reliability Organization shall establish and maintain a system BCP, as part of an overall coordinated Regional SRP. The Regional SRP shall include requirements for verification through analysis how system blackstart generating units shall perform their intended functions and shall be sufficient to meet SRP expectations. The Regional Reliability Organization shall coordinate with and among other Regional Reliability Organizations as appropriate in the development of its BCP. The BCP shall include:	MEDIUM
EOP-007-0	R1.1.	[High only because of R 1.2's importance.] A requirement to have a database that contains all blackstart generators designated for use in an SRP within the respective areas. This database shall be updated on an annual basis. The database shall include the name, location, megawatt capacity, type of unit, latest date of test, and starting method.	MEDIUM
EOP-007-0	R1.2.	[High only because of R 1.2's importance.] A requirement to demonstrate that blackstart units perform their intended functions as required in the Regional SRP. This requirement can be met through either simulation or testing. The BCP must consider the availability of designated BCP units and initial transmission switching requirements.	MEDIUM

<b>Standard Number</b>	<b>Requirement Number</b>	<b>Requirement</b>	<b>Violation Risk Factor</b>
EOP-007-0	R1.3.	[High only because of R 1.2's importance.] Blackstart unit testing requirements including, but not limited to:	MEDIUM
EOP-007-0	R1.3.1.	Testing frequency (minimum of one third of the units each year).	MEDIUM
EOP-007-0	R1.3.2.	[High only because of R 1.2's importance.] Type of test required, including the requirement to start when isolated from the system.	MEDIUM
EOP-007-0	R1.3.3.	[High only because of R 1.2's importance.] Minimum duration of tests.	MEDIUM
EOP-007-0	R1.4.	[High only because of R 1.2's importance.] A requirement to review and update the Regional BCP at least every five years.	MEDIUM
EOP-007-0	R2.	The Regional Reliability Organization shall provide documentation of its system BCPs to NERC within 30 calendar days of a request.	LOWER
EOP-008-0	R1.	Each Reliability Coordinator, Transmission Operator and Balancing Authority shall have a plan to continue reliability operations in the event its control center becomes inoperable. The contingency plan must meet the following requirements:	MEDIUM
EOP-008-0	R1.1.	The contingency plan shall not rely on data or voice communication from the primary control facility to be viable.	MEDIUM
EOP-008-0	R1.2.	The plan shall include procedures and responsibilities for providing basic tie line control and procedures and for maintaining the status of all inter-area schedules, such that there is an hourly accounting of all schedules.	MEDIUM
EOP-008-0	R1.3.	The contingency plan must address monitoring and control of critical transmission facilities, generation control, voltage control, time and frequency control, control of critical substation devices, and logging of significant power system events. The plan shall list the critical facilities.	MEDIUM
EOP-008-0	R1.4.	The plan shall include procedures and responsibilities for maintaining basic voice communication capabilities with other areas.	MEDIUM
EOP-008-0	R1.5.	The plan shall include procedures and responsibilities for conducting periodic tests, at least annually, to ensure viability of the plan.	MEDIUM
EOP-008-0	R1.6.	The plan shall include procedures and responsibilities for providing annual training to ensure that operating personnel are able to implement the contingency plans.	MEDIUM
EOP-008-0	R1.7.	The plan shall be reviewed and updated annually.	MEDIUM
EOP-008-0	R1.8.	Interim provisions must be included if it is expected to take more than one hour to implement the contingency plan for loss of primary control facility.	MEDIUM
EOP-009-0	R1.	The Generator Operator of each blackstart generating unit shall test the startup and operation of each system blackstart generating unit identified in the BCP as required in the Regional BCP (Reliability Standard EOP-007-0_R1). Testing records shall include the dates of the tests, the duration of the tests, and an indication of whether the tests met Regional BCP requirements.	MEDIUM

<b>Standard Number</b>	<b>Requirement Number</b>	<b>Requirement</b>	<b>Violation Risk Factor</b>
EOP-009-0	R2.	The Generator Owner or Generator Operator shall provide documentation of the test results of the startup and operation of each blackstart generating unit to the Regional Reliability Organizations and upon request to NERC.	LOWER
CIP-001-0	R1.	Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall have procedures for the recognition of and for making their operating personnel aware of sabotage events on its facilities and multi site sabotage affecting larger portions of the Interconnection.	MEDIUM
CIP-001-0	R2.	Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall have procedures for the communication of information concerning sabotage events to appropriate parties in the Interconnection.	MEDIUM
CIP-001-0	R3.	Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall provide its operating personnel with sabotage response guidelines, including personnel to contact, for reporting disturbances due to sabotage events.	MEDIUM
CIP-001-0	R4.	Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall establish communications contacts, as applicable, with local Federal Bureau of Investigation (FBI) or Royal Canadian Mounted Police (RCMP) officials and develop reporting procedures as appropriate to their circumstances.	MEDIUM