

Consideration of Comments on First Draft of Revisions to EOP-004-0 (Revision to Form EIA-417)

Background:

The requester thanks all those who submitted comments on the first draft of the SAR and associated proposed revisions to EOP-004-0 – Disturbance Reporting. The proposed revisions were posted for an initial public comment period from December 29, 2005 through February 17, 2006. The drafting team asked stakeholders to provide feedback on

the standards through a special Standard Comment Form. There were 16 sets of comments, including comments from more than 64 different people from more than 44 companies representing 6 of the 9 Industry Segments, and all NERC Regions as shown in the table on the following pages.

Revision May 19, 2006:

The version of EOP-004-1 posted for pre-ballot review inadvertently eliminated the ability to substitute the DOE disturbance report for the NERC disturbance report in requirement 3.1. During the 30-day pre-ballot review periods several stakeholders brought this inconsistency to the attention of the requester and the requester confirmed this was not intended and modified the standard to return this option to requirement 3.1. This is consistent with the presentation of the alternatives proposed in the last comment period.

There was a comment submitted suggesting that requirement 3.1 be modified to omit the reference to the DOE form, and the response to that comment has been modified. (See response highlighted in yellow on page 8 of this document.)

The proposed standard has been reposted with the preceding change for an additional 30-day pre-ballot review.

This SAR and proposed change to EOP-004 was precipitated by a change in the EIA 417 (new OE-417, now a DOE document) document that is included in the standard's appendix. The initial question addressed in the comment form was the need to make a change to the standard. The majority of those responding agreed with the need to make a change to EOP-004-0 to reflect the changes to the EIA document. The requester suggested two alternative methods to resolve the inconsistency caused by the change in the EIA document: 1) Update the appendix of the document or 2) Remove the appendix (appendectomy). An overwhelming majority of the respondents supported the removal of the DOE document from EOP-004. There were some additional comments included, but most were directed at modifications outside the scope of the SAR. No regional differences were noted.

In this 'Consideration of Comments' document, stakeholder comments have been organized so that it is easier to see the summary of comments submitted in response to each question listed on the comment form. All comments received on the first draft of this SAR and associated proposed standards can be viewed in their original format at:

http://www.nerc.com/~filez/standards/Disturbance_Reporting.html

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Gerry Cauley at 609-452-8060 or at gerry.cauley@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

¹ The appeals process is in the Reliability Standards Process Manual: <http://www.nerc.com/standards/newstandardsprocess.html>.

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G1 – ISO/RTO Council

G2 – Southwest Power Pool Operating Reliability Working Group

G3 – Midwest Reliability Organization

G4 – FRCC

G5 – Southern Company Services

G5 – NERC Standards Evaluation Subcommittee

Commenter	Organization	Industry Segment								
		1	2	3	4	5	6	7	8	9
Dan Boezio (G2)	AEP	X								
James H. Sorrels, Jr.	AEP	X				X	X			
Anita Lee (G1)	AESO		X							
William J. Smith	Allegheny Power	X								
Ken Goldsmith (G3)	Alliant Energy		X							
Dave Rudolph (G3)	BEPC		X							
Daniel Taormina	BG&E	X								
Lisa Szot (G1)	CA ISO		X							
Jason Atwood (G2)	Calpine						X			
Larry Conrad	Cinergy									
Jeffrey T. Baker	Cinergy	X		X			X			
Alan Gale (G4)	City of Tallahassee					X				
Lou Roeder	Dominion	X								
Ed Davis	Entergy Services	X								
Bill Bojorquez (G5)	ERCOT		X							
Sam Jones (G1)	ERCOT		X							
John Blazekovich	Exelon	X		X		X	X			
Eric Senkowicz (G4)	FRCC		X							
Linda Campbell (G4)	FRCC		X							
Phil Winston (G5)	Georgia Power			X						
Randy Root (G2)	GRDA	X								
Dick Pursley (G3)	GRE	X								
Roger Champagne	Hydro-Québec TransÉnergie	X								
Ron Falsetti (G1)	IESO		X							
Peter Brandien (G1)	ISO-NE		X							
Mike Gammon (G2)	KCPL	X								
Dennis Florom (G3)	LES		X							
John Horakh,	MAAC		X							

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Tom Mielnik (G3)	MEC		X											
Robert Coish (G3)	MHEB		X											
William Phillips (G1)	MISO		X											
Terry Bilke (G3)	MISO		X											
Joe Knight (G3)	MRO		X											
Al Boesch (G3)	NPPD	X												
Michael Calimano (G1)	NYISO		X											
Todd Gosnell (G3)	OPPD		X											
Bruce Balmat (G1)	PJM		X											
Eric Grant (G4)	Progress Energy - Florida	X												
Steve Wallace (G4)	Seminole Electric Cooperative				X									
Neil Shockey	Southern California Edison	X												
Marc M. Butts (G5)	Southern Company Services	X												
Jim Viikinsalo (G5)	Southern Company Services	X												
Jim Busbin (G5)	Southern Company Services	X												
Wayne Guttormson (G3)	SPC		X											
Charles Yeung (G1)	SPP		X											
Robert Rhodes (G2)	SPP		X											
Bob Cochran (G2)	SPS	X												
Darrick Moe (G3)	WAPA		X											
Howard Rulf	We Energies			X	X	X								
Allen Klassen (G2)	Westar	X												
Jim Maenner (G3)	WPSC		X											
Pam Oreschnick (G3)	XEL		X											

Index to Questions, Comments and Responses:

1. Do you agree with the need to make revisions to EOP-004-0 to ensure consistency between the standard and the Department of Energy document?..... 5
2. Considering the explanation above, would you prefer to proceed with option 1 or 2?..... 7
3. Do you have any additional comments?10
4. Please identify any regional differences that should be included in the standards?.....12

Consideration of Comments on First Draft of Revisions to EOP-004-0 (Revision to Form EIA-417)

1. Do you agree with the need to make revisions to EOP-004-0 to ensure consistency between the standard and the Department of Energy document?

Summary Consideration: Most commenters agreed with the need to make revisions to EOP-004-0.

1. Do you agree with the need to make revisions to EOP-004-0 to ensure consistency between the standard and the Department of Energy document?			
Commenter	Yes	No	Comment
John Horakh	x		
Lou Roeder-Dominion		x	
NERC SES	x		The SES believes revisions are required to EOP-004-0 due to the fact that the DOE document is contained within the standard. The SES supports option 2 listed above and feels that documents by other parties such as DOE, FERC, IEEE, etc. or other forms proposed by NERC should be referenced in a standard and not included within the standard itself necessitating the revision process the EOP-004-0 is currently undergoing. The SES would ask the SDT to bring this issue to the attention of the NERC Standards Authorization Committee for further review and discussion.
Response: The requester agrees with the SES but believes the issue has been brought to the attention of the SAC through this SAR.			
Ed Davis-Entergy	x		
Daniel Taormina-BGE	x		
MRO	x		
ISO/RTO Council	x		
Howard Rulf-We Energies	x		
ORWG	x		
Southern Co-Transmission	x		
James Sorrels, Jr- AEP	x		
Jeffrey Baker-Cinergy	x		
John Blazekovich-Exelon Corp	x		
Roger Champagne-HQ	x		

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1. Do you agree with the need to make revisions to EOP-004-0 to ensure consistency between the standard and the Department of Energy document?			
Commenter	Yes	No	Comment
TransEnergie			
Neil Shockey- So Cal Edison	x		
FRCC	x		
William J. Smith- Allegheny Power	x		

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2. Considering the explanation above, would you prefer to proceed with option 1 or 2?

The two options were:

- 1 – Update the attachment to EOP-004, which is a Department of Defense form for reporting outages
- 2 – Remove the attachment from the standard to prevent the need to update the standard if the form changes in the future

Two versions of the proposed revisions to the standard were posted – one for option 1 and one for option 2. The requester indicated he'd proceed with whichever version conformed to the selected option.

Summary Consideration: Most commenters selected option 2. Based on this selection, the requester is proceeding with the version of the standard that does not include the revised form.

2. Considering the explanation above, would you prefer to proceed with option 1 or 2?			
Commenter	Opt 1	Opt 2	Comment
John Horakh		x	<p>In addition to removing Attachment 2, the following must be done, which is not shown on the documents posted for the Attachment Removed option:</p> <p>In R3.1, remove or modify the words indicating that submitting a copy of a DOE report to NERC is an acceptable substitute for the NERC report. Perhaps have a statement to indicate that submitting a copy of a similar report may be acceptable to NERC, but the entity must contact NERC to get approval first.</p> <p>In R3.2, remove the reference to Attachment 2.</p> <p>In the Introduction of Attachment 1-EOP-004-0, remove or modify the words indicating that submitting a copy of a DOE report to NERC is an acceptable substitute for the NERC report. Perhaps have a statement to indicate that submitting a copy of a similar report may be acceptable to NERC, but the entity must contact NERC to get approval first</p> <p>Show the proper Table 1-EOP-004-0, that is, the one showing NERC reporting requirements, not DOE requirements.</p>
<p>Response: The requester appreciates your input; the references you list for deletion, if deleted, would require an entity to submit duplicate information to the DOE and to NERC. As you indicate, rewording the requirement is difficult without some reference to the DOE document. The intent of the revision to the existing standard was to remove the specific reference to and, inclusion of, EIA-417, but not to preclude entities from submitting the form as satisfaction of the NERC requirement. The form and any specific references have been removed while still allowing the submitting entity to substitute the DOE form in place of the attached NERC disturbance report.</p>			
Southern Co-Transmission	x		
William J. Smith-Allegheny Power	x		

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2. Considering the explanation above, would you prefer to proceed with option 1 or 2?			
Commenter	Opt 1	Opt 2	Comment
Ed Davis- Entergy		x	We suggest deleting all reference to any specific DOE document, schedule, or form. We suggest deleting 2-EOP-004-0 from R3.2 and deleting that attachment from this requirement. We also suggest deleting reference to the DOE Form in Table 1-EOP-004-0.
Response: The requester appreciates your input; the references you list for deletion should have been identified in the redlined document, but were overlooked.			
Lou Roeder- Dominion		x	We think the EOP-004-0 standard should remove the OE-417 (old EIA-417) Form (attachment), but the standard should name and also point to the DOE website (provide the site name & link) where OE-417 resides with the most up to date and official form.
Response: Thank you for your input, but the requester notes: providing the website information would result in exactly the conundrum we face now if the website address were changed.			
Neil Shockey- So Cal Edison		x	Perhaps an alternate solution would be to retain the Introduction of Attachment 2 then simply refer people to the DOE website for the DOE reporting requirements.
Response: Thank you for your input, but the requester notes: providing the website information would result in exactly the conundrum we face now if the website address were changed.			
FRCC		x	A reference to the DOE Form within the standard is sufficient. A repetition of the DOE forms and instructions is redundant and may introduce "requirement" synchronization issues in the future. The option of sending the DOE reporting form as a proxy to the NERC form should be maintained in the revision in order to minimize duplicative reporting requirements.
Response: The requester appreciates your input and agrees.			
Daniel Taormina- BGE		x	Placing a DOE standard inside a NERC document will not guarantee that all DOE changes will be monitored or updated in the NERC standard. A reliability standard should reference documents that will be reviewed and updated by the Reliability Standard development process, thereby ensuring the most up to date information is presented.
Response: Thank you for your input.			
MRO		x	Utilities are required to submit the appropriate DOE form whether or not it is attached to the NERC Standard and so there is no useful purpose to have a description of the form and what to do with it in the standard. NERC has its own reporting standards and they can stand on their own just as the DOE reporting requirement can.
Response: Thank you for your input.			
ISO/RTO Council		x	Of these two choices, it would be preferable to just reference the DOE explanation and form rather than include it in this standard and have to go through the NERC Standards Process each time DOE makes a change.
Response: Thank you for your input.			

Consideration of Comments on First Draft of Revisions to EOP-004-0 (Revision to Form EIA-417)

2. Considering the explanation above, would you prefer to proceed with option 1 or 2?			
Commenter	Opt 1	Opt 2	Comment
NERC SES		x	See our comment in #1.
Response: The requester agrees with the SES but believes the issue has been brought to the attention of the SAC through this SAR.			
Howard Rulf- We Energies		x	
ORWG		x	
James Sorrels, Jr- AEP		x	
Jeffrey Baker- Cinergy		x	
John Blazekovich- Exelon Corp		x	
Roger Champagne- HQ TransEnergie		x	

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3. Do you have any additional comments?

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Commenter	Comment
Daniel Taormina-BGE	<p>Is it necessary to have two separate reporting forms (DOE and NERC)? One joint document for reporting may lead to more convenient or timely reporting to both organizations.</p> <p>The Reliability Standard should specify that the standard does not apply to an electric distribution system disturbance.</p> <p>Multiple entities may be involved with the load shedding decision making and implementation strategy. The reliability standard should specify the entity responsible for reporting the event.</p>
<p>Response: Although the requester may agree with your observation, the suggestions are outside the scope of the SAR.</p>	
ISO/RTO Council	<p>Yes. Requirement 3.2 should be changed to eliminate the reference to Attachment 2, since it is being deleted. Suggested wording: "The applicable reporting form is provided in Attachment 1-EOP-004-0."</p> <p>Also, you might want to consider whether DOE should even be mentioned in this standard. Requirements of other organizations such as DOE are not really part of the NERC reliability standards process. It might be better to limit NERC standards to those reliability-oriented areas which are promulgated by NERC. This is more in line with the NERC ERO Application which states: "Reliability standards shall be complete and self-contained; the standards shall not depend on external information to determine the required level of performance or outcomes."</p>
<p>Response: The requester appreciates your input; the references you list for deletion should have been identified in the redlined document, but were overlooked.</p>	
ORWG	<p>NERC needs to continue to maintain the DOE form as a reference document or training aid somewhere in the NERC documentation.</p>
<p>Response: The requester appreciates your input and agrees, but the scope of this SAR is limited to EOP-004-1.</p>	
NERC SES	<p>The SES has not identified any regional differences not already addressed by the standard (note, DOE reporting is not required by Canadian utilities or by Comision Federal de Electricidad (CFE) in the Baja peninsula of western Mexico.</p>
<p>Response: Thank you for your input</p>	
John Blazekovich-Exelon Corp	<p>Yes - EOP-004 has requirements that are not well defined and need to be revised. Requirement 3 requires that RC, BA, TOP, GOP and LSE experiencing a reportable incident to issue a preliminary report, the use of the word experiencing can be too widely interpreted and should be more clearly directed to the entity that has functional control of the equipment that is at the root of the event. Requirement 4 that places a requirement on the Regional Reliability Organizations to provide expertise to help with the disturbance investigation and or report essentially requires the RRO to direct manpower that it probably has no control over - generally employees of the member companies. Although providing manpower may be the right thing to do and is a good practice the requirement should not be included in this standard. Requirement 5 again although a good concept the requirement need to be further defined in order to establish measureable requirements. In its present form an RRO could perform 2 reviews one in the morning and one in the afternoon and be compliant with this requirement or if a report is not filed until the 1st week of</p>

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3. Do you have any additional comments?	
Commenter	Comment
	December if the RRO does not perform 2 reviews within the last month it would be non-compliant. Understand that the intent of this comment period was not to address issues with the Standard requirements but they need to be fixed prior to this standard becoming law. The Compliance Elements Standard Drafting Team (CESDT) is aware of the problems with this Standard's requirements but it is outside of their scope to repair poor standard requirements.
Response: Although the requester may agree with your observation, the suggestions are outside the scope of the SAR.	
Roger Champagne- HQ TransEnergie	For non US entities, DOE forms and report are not a requirement. NERC Standard should take this into account and indicate that only the "NERC Interconnection Reliability Operating Limit and Preliminary Disturbance Report" form is required from those non US entities. In the Standard it should be clear that the DOE forms are optional for non US entities. If option 2 is retained, remove reference to Attachment 2-EOP-004-0 in R3.2
Response: The requester appreciates your input; the references you list for deletion should have been identified in the redlined document, but were overlooked.	
FRCC	As the drafting team develops this revision it should try to address some of the inconsistencies in terminology within the existing standard and attachment 1. For example: R2. "promptly analyze BES disturbances'..what is promptly, under the current glossary definitions this includes every generator trip or system perturbation. R3. references "reportable incident", attachment 1 introduction, references "reportable disturbances" and the criteria are labeled as "events". R3.4. references the concept of a "final" report within 60 days based on "judgment"..this may be a difficult criteria to address when reviewing for compliance. R5. references "sufficient diligence" which again may be difficult to measure in the compliance arena. We would suggest that attachment 1 be revised to reflect the criteria set forth in OE-417 and an attempt be made at limiting the additional NERC imposed reporting criteria to those that can be clearly stipulated and understood. Some of the current criteria encompass many operational events including some that may be very routine in today's system operations. This would also maintain the current reporting "synergies" with the DOE requirements. The FRCC understands and appreciates that this standard has also served as a "lessons learned", operating experience, sharing document, but as NERC evolves toward an ERO oversight, we must provide the industry with clear and unambiguous requirements, particularly within the realm of the Reliability Standards. One thought would be to focus this standard on short term reporting requirements for the purposes of maintaining BES reliability in the near term and transferring long term "lessons learned", Operating Experience, and information sharing requirements to a different standard. This could also apply to the "final" report concept and tracking requirements.
Response: Although the requester may agree with your observation, the suggestions are outside the scope of the SAR.	
Southern Co-Transmission	No additional comments at this time.

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4. Please identify any regional differences that should be included in the standards?

Summary Consideration: No regional differences were identified.

4. Please identify any regional differences that should be included in the standards?	
Commenter	Comment
Daniel Taormina-BGE	The Reliability Standard should differentiate the reporting process for entities that operate as members of an RTO.
Response: The requester is unclear what regional difference would be required by this comment.	
William J. Smith-Allegheny Power	Not aware of any regional differences.
ISO/RTO Council	None
Southern Co-Transmission	None
John Blazekovich-Exelon Corp	None
FRCC	None