

Comment Form

Proposed Revision to EOP-004-0 (Revision to Form EIA-417)

This form is to be used to submit comments on the proposed revision to EOP-004-0. Comments must be submitted by **February 17, 2006**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "Proposed Revision to Form EOP-004-0 Comments" in the subject line. If you have questions please contact Mark Ladrow at mark.ladrow@nerc.net or by telephone at 609-452-8060.

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Do not submit a response in an unprotected copy of this form.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC		
<input type="checkbox"/> NA – Not Applicable		

Background Information

Posted for comments is the first posting of the Proposed Revision to EOP-004-0 SAR and concurrent posting of the two options for proposed revisions to EOP-004-0. The revision to EOP-004-0 was necessitated by a revision to the Department of Energy (DOE) document EIA-417 that is referenced in the attachment to EOP-004-1. This change in the DOE document highlighted a concern with attaching a document in a NERC standard where the control of the document is outside of the NERC standards process. The standards action and this comment form suggest one of two options to proceed:

- 1) Update the current attachment to reflect the changes of the DOE document or;
- 2) Remove the attachment to avoid the conflict in the future.

The requestor would like to determine if the stakeholders prefer option 1 or 2 above. If the industry prefers option 2, the information contained in the current Attachment 2 to EOP-004-0 could be presented as a training aid or through some other vehicle outside of the standards process.

Consistent with the explanation above, there are two proposed standards posted with this comment form; one proposed standard maintains the current format with text and a summary from the DOE OE-417 (the superceding document) and the second document deletes Attachment 2 in its entirety.

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These documents referenced above can be accessed at the following links:

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?

Yes

No

Comments:

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

Option 1 (keep Attachment 2)

Option 2 (remove Attachment 2)

Comments: 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.

3. Do you have any additional comments?

Comments: 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."

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."

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

Comments: None

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Lou Roeder	
Organization:	Dominion	
Telephone:	804-273-3313	
E-mail:	Lou_Roeder@dom.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
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Yes

No

Comments:

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

Option 1 (keep Attachment 2)

Option 2 (remove Attachment 2)

Comments: 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.

3. Do you have any additional comments?

Comments:

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

Comments:

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	William J. Smith	
Organization:	Allegheny Power	
Telephone:	(724) 838-6552	
E-mail:	wsmith1@alleghenypower.com	
NERC Region		Registered Ballot Body Segment
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Yes

No

Comments:

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

Option 1 (keep Attachment 2)

Option 2 (remove Attachment 2)

Comments:

3. Do you have any additional comments?

Comments: No additional comments

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

Comments: Not aware of any regional differences.

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Yes

No

Comments:

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

Option 1 (keep Attachment 2)

Option 2 (remove Attachment 2)

Comments:

- 3. Do you have any additional comments?

Comments: NERC needs to continue to maintain the DOE form as a reference document or training aid somewhere in the NERC documentation.

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

Comments:

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Yes

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Comments:

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

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Comments:

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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?

Yes

No

Comments: 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.

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

Option 1 (keep Attachment 2)

Option 2 (remove Attachment 2)

Comments: See our comment in #1.

3. Do you have any additional comments?

Comments:

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

Comments: 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.

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Organization:	MAAC
Telephone:	609-625-6014
E-mail:	john.horakh@pepcoholdings.com
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These documents referenced above can be accessed at the following links:

- 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?

Yes

No

Comments:

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

Option 1 (keep Attachment 2)

Option 2 (remove Attachment 2)

Comments: In addition to removing Attachment 2, the following must be done, which is not shown on the documents posted for the Attachment Removed option:

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.

In R3.2, remove the reference to Attachment 2.

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

Show the proper Table 1-EOP-004-0, that is, the one showing NERC reporting requirements, not DOE requirements.

Comment Form — Proposed Revision to EOP-004-0 (Rev. to Form EIA-417)

3. Do you have any additional comments?

Comments:

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

Comments:

Comment Form

Proposed Revision to EOP-004-0 (Revision to Form EIA-417)

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ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE AND IT IS THEREFORE IMPORTANT TO ADHERE TO THE FOLLOWING REQUIREMENTS:

DO: Do enter text only, with no formatting or styles added.
 Do use punctuation and capitalization as needed (except quotations).
 Do use more than one form if responses do not fit in the spaces provided.
 Do submit any formatted text or markups in a separate WORD file.

DO NOT: Do not insert tabs or paragraph returns in any data field.
 Do not use numbering or bullets in any data field.
 Do not use quotation marks in any data field.
 Do not submit a response in an unprotected copy of this form.

Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Howard Rulf
Organization:	We Energies
Telephone:	262-574-6046
E-mail:	Howard.Rulf@we-energies.com
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 — Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/> 2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/> 3 — Load-serving Entities
<input type="checkbox"/> MAAC	<input checked="" type="checkbox"/> 4 — Transmission-dependent Utilities
<input checked="" type="checkbox"/> MAIN	<input checked="" type="checkbox"/> 5 — Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/> 6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/> 7 — Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/> 8 — Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/> 9 — Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	
<input type="checkbox"/> NA – Not Applicable	

Background Information

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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?

Yes

No

Comments:

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

Option 1 (keep Attachment 2)

Option 2 (remove Attachment 2)

Comments:

3. Do you have any additional comments?

Comments:

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

Comments:

Comment Form

Proposed Revision to EOP-004-0 (Revision to Form EIA-417)

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 - Do not** use quotation marks in any data field.
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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	<input type="checkbox"/>	
<input type="checkbox"/> NA – Not Applicable		

Group Comments (Complete this page if comments are from a group.)			
Group Name:	Midwest Reliability Organization (MRO)		
Lead Contact:	Dick Pursley		
Contact Organization:	MRO for group (GRE for lead contact)		
Contact Segment:	2		
Contact Telephone:	763-241-2249		
Contact E-mail:	dpursley@greenergy.com		
Additional Member Name	Additional Member Organization	Region*	Segment*
Al Boesch	NPPD	MRO	2
Terry Bilke	MISO	MRO	2
Robert Coish	MHEB	MRO	2
Dennis Florom	LES	MRO	2
Ken Goldsmith	Alliant Energy	MRO	2
Todd Gosnell	OPPD	MRO	2
Wayne Guttormson	SPC	MRO	2
Jim Maenner	WPSC	MRO	2
Darrick Moe, Chair	WAPA	MRO	2
Pam Oreschnick	XEL	MRO	2
Dave Rudolph	BEPC	MRO	2
Tom Mielnik	MEC	MRO	2
Joe Knight, Secretary	MRO	MRO	2
27 Additional MRO Members	Companies not named above	MRO	2

*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

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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?

Yes

No

Comments:

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

Option 1 (keep Attachment 2)

Option 2 (remove Attachment 2)

Comments: 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.

- 3. Do you have any additional comments?

Comments:

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

Comments:

Comment Form

Proposed Revision to EOP-004-0 (Revision to Form EIA-417)

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Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	James H. Sorrels, Jr.
Organization:	American Electric Power
Telephone:	(614) 716-2370
E-mail:	jhsorrels@aep.com
NERC Region	Registered Ballot Body Segment
<input checked="" type="checkbox"/> ERCOT	<input checked="" type="checkbox"/> 1 — Transmission Owners
<input checked="" type="checkbox"/> ECAR	<input type="checkbox"/> 2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 — Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/> 4 — Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input checked="" type="checkbox"/> 5 — Electric Generators
<input type="checkbox"/> MAPP	<input checked="" type="checkbox"/> 6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/> 7 — Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/> 8 — Small Electricity End Users
<input checked="" type="checkbox"/> SPP	<input type="checkbox"/> 9 — Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	
<input type="checkbox"/> NA – Not Applicable	

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No

Comments:

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Option 2 (remove Attachment 2)

Comments:

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Comments:

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Comments:

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Ed Davis	
Organization:	Entergy Services	
Telephone:	601-339-2614	
E-mail:	edavis@entergy.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 — Load-serving Entities
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Yes

No

Comments:

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

Option 1 (keep Attachment 2)

Option 2 (remove Attachment 2)

Comments:

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.

- 3. Do you have any additional comments?

Comments: No.

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

Comments:

Comment Form

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Neil Shockey	
Organization:	Southern California Edison	
Telephone:	626-302-4604	
E-mail:	neil.shockey@sce.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
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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?

Yes

No

Comments:

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

Option 1 (keep Attachment 2)

Option 2 (remove Attachment 2)

Comments: 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.

- 3. Do you have any additional comments?

Comments:

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

Comments:

Comment Form

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Daniel Taormina	
Organization:	Baltimore Gas and Electric	
Telephone:	410 597 7593	
E-mail:	dan.taormina@bge.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
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Yes

No

Comments:

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

Option 1 (keep Attachment 2)

Option 2 (remove Attachment 2)

Comments: Placing a DOE standard inside a NERC document will not gurantee 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.

- 3. Do you have any additional comments?

Comments: Is it nessesary to have two separate reporting forms (DOE and NERC)? One joint document for reporting may lead to more convinent or timely reporting to both organizations.

The Reliability Standard should specify that the standard does not apply to an electric distribution system disturbance.

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.

Comment Form — Proposed Revision to EOP-004-0 (Rev. to Form EIA-417)

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

Comments: The Reliability Standard should differentiate the reporting process for entities that operate as members of an RTO.

Comment Form

Proposed Revision to EOP-004-0 (Revision to Form EIA-417)

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Jeffrey T. Baker	
Organization:	Cinergy	
Telephone:	513-287-3368	
E-mail:	jeff.baker@cinergy.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input checked="" type="checkbox"/> ECAR	<input type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> MAPP	<input checked="" type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	<input type="checkbox"/>	
<input type="checkbox"/> NA – Not Applicable		

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Yes

No

Comments:

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

Option 1 (keep Attachment 2)

Option 2 (remove Attachment 2)

Comments:

- 3. Do you have any additional comments?

Comments:

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

Comments:

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Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
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Comments:

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Option 1 (keep Attachment 2)

Option 2 (remove Attachment 2)

Comments: 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.

- 3. Do you have any additional comments?

Comments: 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.

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

Comments: None

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(Complete this page for comments from one organization or individual.)		
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Yes

No

Comments:

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

Option 1 (keep Attachment 2)

Option 2 (remove Attachment 2)

Comments:

3. Do you have any additional comments?

Comments: No additional comments at this time.

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

Comments: None.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Roger Champagne	
Organization:	Hydro-Québec TransÉnergie	
Telephone:	514-289-2211, ext. 2766	
E-mail:	champagne.roger.2@hydro.qc.ca	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
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Comments:

3. Do you have any additional comments?

Comments:

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 optionnal for non US entities.

If option 2 is retained, remove reference to Attachment 2-EOP-004-0 in R3.2

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

Comments:

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Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	John Blazekovich
Organization:	Exelon Corporation
Telephone:	630-691-4777
E-mail:	john.blazekovich@exeloncorp.com
NERC Region	Registered Ballot Body Segment
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Comments:

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Option 1 (keep Attachment 2)

Option 2 (remove Attachment 2)

Comments:

- 3. Do you have any additional comments?

Comments: 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 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

Comment Form — Proposed Revision to EOP-004-0 (Rev. to Form EIA-417)

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.

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

Comments: None