

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

Request for an Interpretation of a Reliability Standard	
Date submitted:	January 20, 2010
Date accepted:	January 20, 2010
Contact information for person requesting the interpretation:	
Name:	Thomas E Washburn
Organization:	Florida Municipal Power Pool
Telephone:	407-384-4066
E-mail:	twashburn@ouc.com
Identify the standard that needs clarification:	
Standard Number (include version number):	EOP-001-1
Standard Title:	Emergency Operations Planning
Identify specifically what requirement needs clarification:	
Requirement Number and Text of Requirement:	
R2.4. Develop, maintain, and implement a set of plans for system restoration.	
Clarification needed:	
According to the NERC Functional Model, the Balancing Authority is responsible for maintaining load-generation-interchange balance within the Balancing Authority Area and for supporting interconnection frequency in real-time.	
Since the Balancing Authority is not a Transmission Owner, Transmission Operator, Generator Owner, Generator Operator, or Load-Serving Entity, what does "a set of plans for system restoration" mean for a Balancing Authority? Are the plans for system restoration referred to in Requirement R2.4 related to the Balancing Authority's responsibility for maintaining load-generation-interchange balance at all times including during a system restoration?	
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.	
Not having the correct interpretation of this requirement could cause the BA to be found non-compliant.	

Interpretation 2010-04: Response to Request for an Interpretation of EOP-001-1, Requirement R2.4, for Florida Municipal Power Pool	
The following interpretation ¹ of EOP-001-1 — Emergency Operations Planning, Requirement R2.4, was developed by several members of the Project 2006-03 (System Restoration and Blackstart) drafting team.	
Requirement Number and Text of Requirement	
R2.4. Develop, maintain, and implement a set of plans for system restoration.	
Question 1	
Are the plans for system restoration referred to in Requirement R2.4 related to the Balancing Authority’s responsibility for maintaining load-generation-interchange balance at all times including during a system restoration?	
Response 1	
Yes.	
Question 2	
What does “a set of plans for system restoration” mean for a Balancing Authority?	
Response 2	
In addition to the Balancing Authority’s stated responsibilities of maintaining the load-generation-interchange balance at all times, the Balancing Authority’s “plans for system restoration” must, at a minimum, incorporate provisions to comply with the applicable Balancing Authority requirements of EOP-005-1.	

¹ At the time of posting for this response (March 5, 2010), EOP-001-0 is the current Federal Energy Regulatory Commission (FERC)-approved version of the EOP-001 Reliability Standard in the United States and is therefore mandatory and enforceable. EOP-001-1 has been filed with but not yet approved by FERC; therefore, EOP-001-1 is not mandatory and enforceable in the United States at this time. The requirement in question, Requirement R2.4 of EOP-001-1 exists in EOP-001-0 as Requirement R3.4.