

Compliance Application Notice — 0039

Compliance Application: EOP-004-1 Filing DOE Form OE-417 Event Reports

Posted [DATE]

Primary Interest Groups

NERC
Regional Entities (RE)
Reliability Coordinators (RC)
Balancing Authorities (BA)
Transmission Operators (TOP)
Generator Operators (GOP)
Load Serving Entities (LSE)
Regional Reliability Organizations

Issue: Filing an OE-417 Report with the DOE and NERC

The Department of Energy's (DOE) new online process for submitting the OE-417 disturbance reporting form does not automatically issue a copy to NERC or the Regions.

Reliability Objective

Disturbances or unusual occurrences that jeopardize the operation of the Bulk Power System, or result in system equipment damage or customer interruptions, need to be studied and understood to minimize the likelihood of similar events in the future.

Background

The DOE's Electric Emergency Incident and Disturbance Report (Form OE-417) collects information on electric incidents and emergencies. The Department of Energy uses the information to fulfill its overall national security and energy emergency management responsibilities, as well as for analytical purposes. Beginning January 2011, the DOE initiated a new process for responsible entities to submit OE-417 reports for qualifying events. Entities now go to the DOE web site and fill out an online form for submission. No copies of the report are simultaneously distributed to NERC. Therefore, NERC and the Regions have no record of the submission. Standard EOP-004-1, Table 1-EOP-004-0 states, in pertinent part:

All entities required to file a DOE OE-417 report (Schedule 1 & 2) shall send a copy of these reports to NERC simultaneously, but no later than 24 hours after the start of the incident or disturbance.

Compliance Application

EOP-004-1 R3 provides, in pertinent part:

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.

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.

R3.2. Applicable reporting forms are provided in Attachments 1-EOP-004 and 2-EOP-004.

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.

Entities must email a copy of a filed OE-417 report to NERC at ESISAC@nerc.com and their Regional Entity within 24 hours of the disturbance or unusual occurrence to fulfill the requirements of EOP-004-1. Failure to do so will result in a violation of EOP-004-1.

DOE's institution of a new process does not provide an exemption to EOP-004. In the event a registered entity submitted an OE-417 report online between January 2011 and posting of this CAN on the NERC web site, and did not provide NERC with a copy, it may result in a violation of the standard. However, the registered entity should still submit a copy of the report to NERC at ESISAC@nerc.com immediately. As is the case with resolution of all violations of NERC Reliability Standards, the specific facts and circumstances will be considered for any determined violation.

Effective Period for CAN

This CAN is effective for EOP-004-1 upon posting on the NERC Web site. It supersedes all prior communications and will remain in effect until a future CAN supersedes it or until such time that a future version of the standard or interpretation addresses this specific issue and is enforceable, or until it is superseded by a future CAN that addresses this particular Standard and Requirement.

Providing Evidence of Compliance

Entities must provide evidence of the email they sent to NERC that contained the filed OE-417 within 24 hours of submitting it on the DOE's Web site in order to maintain compliance with Standard EOP-004-1.

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This document is designed to convey compliance guidance from NERC's various activities. It is not intended to establish new requirements under NERC's Reliability Standards or to modify the requirements in any existing NERC Reliability Standards. Compliance will continue to be determined based on language in the NERC Reliability Standards as they may be amended from time to time. Implementation of this compliance application notice is not a substitute for compliance with requirements in NERC's Reliability Standards.