
**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Emergency Preparedness and Operations)
Reliability Standards)

Docket No. RM17-12-000

**COMMENTS OF THE
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION
IN RESPONSE TO NOTICE OF PROPOSED RULEMAKING**

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November 27, 2017

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On September 20, 2017, the Federal Energy Regulatory Commission (the “Commission”) issued a Notice of Proposed Rulemaking (“NOPR”)¹ proposing to approve Emergency Preparedness and Operations (“EOP”) Reliability Standards² EOP-004-4 (Event Reporting), EOP-005-3 (System Restoration from Blackstart Resources), EOP-006-3 (System Restoration Coordination), and EOP-008-2 (Loss of Control Center Functionality) submitted by the North American Electric Reliability Corporation (“NERC”).³ NERC supports the Commission’s proposal to approve the proposed EOP Reliability Standards as filed.

NERC agrees with the Commission that the proposed EOP Reliability Standards are intended to:

- provide accurate reporting of events to NERC’s event analysis group to analyze the impact of the reliability of the Bulk Electric System (“BES”) (EOP-004-4);
- delineate the roles and responsibilities of entities that support system restoration from blackstart resources which generate power without the support of the grid (EOP-005-3);

¹ *Emergency Preparedness and Operations Reliability Standards*, Notice of Proposed Rulemaking, 160 FERC ¶ 61,072 (2017).

² *Petition of the North American Electric Reliability Corporation for Approval of Proposed Emergency Operations Reliability Standards*, Docket No. RM17-12-000 (filed Mar. 27, 2017).

³ The Federal Energy Regulatory Commission certified NERC as the electric reliability organization in its order issued on July 20, 2006, in Docket No. RR06-1-000. *North American Electric Reliability Corporation*, 116 FERC ¶ 61,062 (2006).

- clarify the procedures and coordination requirements for Reliability Coordinator personnel to execute system restoration processes (EOP-006-3); and
- refine the required elements of an operating plan used to continue reliable operations of the BES if that primary control functionality is lost (EOP-008-2).

I. NOTICES AND COMMUNICATIONS

Notices and communications with respect to this filing may be addressed to:

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II. Conclusion

NERC looks forward to the Commission's final rule in this proceeding and respectfully requests that the Commission maintain its proposal to approve the proposed EOP Reliability Standards.

Respectfully submitted,

/s/ Nina H. Jenkins-Johnston

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Date: November 27, 2017