Unofficial Comment Form

Project 2009-03 Emergency Operations

Please **DO NOT** use this form for submitting comments. Please use the [electronic form](https://www.nerc.net/nercsurvey/Survey.aspx?s=7340aec5ff6a43c38e504ab30d13bbfc) to submit comments on the Standard. The electronic comment form must be completed by **August 15, 2014**.

If you have questions please contact Laura Anderson at laura.anderson@nerc.net or by telephone at 404-446-9671.

[Project Page](http://www.nerc.com/pa/Stand/Pages/Project-2009-03-Emergency-Operations.aspx)

## Background Information

This posting is soliciting formal comment.

The Emergency Operations Standard Drafting Team (EOP SDT) merged EOP-001-2.1b, EOP-002-3.1 and EOP-003-2 to create EOP-011-1. This re-design enables the requirements for Emergency Operations to be streamlined into a clear and concise standard that is organized by Functional Entity in order to eliminate the ambiguity in previous versions. In addition, the revisions clarify the critical requirements for Emergency Operations and apply Paragraph 81 criteria, while making the standard more results-based and address outstanding directives from FERC Order No. 693.

The EOP SDT posted an initial draft of EOP-011-1 for a 30-day informal comment period through April 28, 2014. The EOP SDT has considered feedback from the informal comment period, as well as other extensive outreach, and many of the suggested changes were incorporated into the second draft of EOP-011-1, including the following:

* The qualifying phrase “Operator-Controlled” has been added preceding “manual Load shedding” in Parts of Requirements R1 and R2. Automatic Load shedding schemes are an important backstop against cascading outages or system collapse. If an entity manually sheds a Load which was included in an automatic scheme, it reduces the effectiveness of that automatic scheme. The EOP SDT acknowledges that, in the formulation of manual Load shedding plans, complete exclusion of Loads armed for automatic Load shedding may not be possible. Each entity should, however, evaluate their automatic Load shedding schemes and coordinate their manual plans so that overlapping use of Loads is avoided to the extent reasonably possible.
* Requirement R3 (along with its associated Measure M3) was removed from the Standard. The EOP SDT has placed the requirement to coordinate plans on the Balancing Authority (Requirement R2, Part 2.5) and on the Transmission Operator (Requirement R1, Part 1.3).
* The EOP SDT agrees with stakeholders that Requirement R5 of EOP-011-1 draft 1 is a parallel to TOP-001-1a and removed Requirement R5 (along with its associated Measure M5) from the Standard.

The EOP SDT received several comments regarding Reliability Coordinator approval of Balancing Authority and Transmission Operator Emergency Operating Plans. Paragraph 548 of Order No. 693 directed that the Reliability Coordinator be included as an applicable entity in EOP-002, and the SDT has carefully considered how to address this directive in EOP-011-1. While plan approval by the Reliability Coordinator is not specifically required by the directive in Order No. 693, the EOP SDT believes that approval by the Reliability Coordinator reduces risk to reliability of the BES.

Other changes were made in response to comments from several stakeholders including:

* Incorporating the notification requirement of Requirement R6 of EOP-011-1 draft 1 within Requirement R2. (Requirement R6 and its associated Measure M6 was removed from the Standard).
* Replaced the words “as soon as practicable” with “as soon as practical” to communicate that timeliness is important, while balancing the concern that in an Emergency there may be a need to alleviate excessive notifications on Balancing Authorities and Transmission Operators.
* Explained in the rationale of Requirement R1 that “Emergency Operating Plan” within the requirements of EOP-011-1 is not intended to be a newly-defined Glossary term; rather, the phrase is a combination of two existing Glossary terms, “Emergency” and “Operating Plan.”
* Removed “Load-Serving Entity” from Requirement R9 of EOP-011-1 draft 1 (which has become Requirement R5 of EOP-011-1 draft 2).
* Removed “NERC” from “Energy Emergency alert.”
* Restored the previous alert levels of Attachment 1.
* In coordination with the Project 2010-14.1 BARC drafting team, the EOP SDT has revised Attachment 1 to remove “Operating Reserves” from EEA 2 and to place “Operating Reserves” in EEA 3, to align with BAL-002-2 that is being developed in that project.

**Coordination with Project 2008-02 Undervoltage Load Shedding**

Project 2008-02 Undervoltage Load Shedding (proposed PRC-010-1) is posted concurrently. Requirements R2, R4, and R7 in EOP-003-2 – Load Shedding Plans are proposed to be replaced by requirement R1 in the proposed PRC-010-1. Stakeholders may wish to review both projects with respect to the transition of these requirements. Both projects and their implementation plans are being closely coordinated to ensure that there is no gap or duplication of requirements created by the work of the two teams.

You do not have to answer all questions. Enter comments in simple text format. Bullets, numbers, and special formatting will not be retained.

## Questions

1. Based on comments from stakeholders, the EOP SDT has added the term “Operator-Controlled” preceding the language “manual Load shedding” in Parts of Requirements R1 and R2. Do you agree with this revision? If not, please provide specific suggestions for change in the comment area.

[ ]  Yes

[ ]  No

Comments:

1. Based on comments from a majority of stakeholders, the EOP SDT removed Requirement 3 from EOP-011-1 draft 1 and has placed the requirement on the Balancing Authority and Transmission Operator to coordinate their Emergency Operating Plans with impacted Balancing Authorities and Transmission Operators. Do you agree with this revision? If not, please provide specific suggestions for change in the comment area.

[ ]  Yes

[ ]  No

Comments:

1. The EOP SDT received several comments regarding Reliability Coordinator approval of Balancing Authority and Transmission Operator Emergency Operating Plans. The FERC directive in Paragraph 548 or Order 693 mandates that the Reliability Coordinator be included as an applicable entity; while plan approval by the Reliability Coordinator was not a specific mandated intent, the EOP SDT believes that approval by the Reliability Coordinator reduces risk to reliability of the BES. Do you agree with this approach? If not, please provide specific suggestions for change in the comment area.

[ ]  Yes

[ ]  No

Comments:

1. The EOP SDT has removed Requirement R5 from EOP-011-1 draft 1, as it is redundant with currently-enforceable TOP-001-1a. Do you agree with this revision? If not, please explain in the comment area below.

[ ]  Yes

[ ]  No

Comments:

1. The EOP SDT has revised Attachment 1, removing “Operating Reserves” from EEA 2 and adding “Operating Reserves” into EEA 3. Do you agree with this change? If not, please explain in the comment area below.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree with the VRFs and VSLs in EOP-011-1? If not, please indicate which Requirement(s) and specifically what you disagree with, and provide suggestions for improvement.

[ ]  Yes

[ ]  No

Comments:

1. If you have any other comments on this Standard that you haven’t already mentioned above, please provide them here:

 Comments: