

# Project 2015-08

# Emergency Operations

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**RELIABILITY | ACCOUNTABILITY**



- Welcome – Connie Lowe, Chair
- NERC Antitrust Compliance Guidelines and Public Announcement - Laura Anderson
- Project 2015-08 Overview
- Proposed Revisions to EOP-004-3, Event Reporting
- Wrap-up and next steps – Connie Lowe

- **NERC Antitrust Guidelines**

- It is NERC's policy and practice to obey the antitrust laws and to avoid all conduct that unreasonably restrains competition. This policy requires the avoidance of any conduct that violates, or that might appear to violate, the antitrust laws. Among other things, the antitrust laws forbid any agreement between or among competitors regarding prices, availability of service, product design, terms of sale, division of markets, allocation of customers or any other activity that unreasonably restrains competition.

- **Notice of Open Meeting**

- Participants are reminded that this webinar is public. The access number was widely distributed. Speakers on the call should keep in mind that the listening audience may include members of the press and representatives of various governmental authorities, in addition to the expected participation by industry stakeholders.

- The Emergency Operations Standards Drafting Team (EOP SDT) is developing revisions based on recommendations that resulted from the Project 2015-02 Emergency Operations Periodic Review of the following standards:
  - EOP-004-2
  - EOP-005-2
  - EOP-006-2
  - EOP-008-1
- Today's webinar will focus on EOP-004-4, Event Reporting

- Emergency Operations Standards Drafting Team (EOP SDT)
  - Connie Lowe – Dominion Resources Services, Inc., Chair
  - Robert Staton – Xcel Energy, Vice Chair
  - Karen Backman – IESO
  - Matthew Beilfuss – We Energy Group
  - Richard Cobb – MISO
  - Bobby Crump – Luminant Generation Co., LLC
  - Jon Langford – SPP
  - Ali Miremadi – California ISO
  - Jack Thomas – PJM
  - Walter Ullrich – Great River Energy
  - Laura Anderson – NERC Standards Developer

- The EOP SDT recommends the following changes to EOP-004-3
  - Update and clarify language in Requirement R2
  - Retire Requirement R3
  - Revise Attachment 1: Reportable Events and Attachment 2: Event Reporting Form

- Clarify in Requirement R2 that each Responsible Entity shall report events “specified in EOP-004-4 Attachment 1 to the entities specified” in its Operating Plan.
  - This is to ensure the Responsible Entity is reporting on the event types and thresholds from EOP-004-4 Attachment 1.
- Clarify what constitutes a weekend for the purpose of implementing the requirement, i.e., “4:00 p.m. local time on Friday to 8:00 a.m. local time on Monday.” The SDT proposes similar language and additional clarifications in Measure M2.

- Retire Requirement R3 under Paragraph 81, Criterion B1, administrative, because it requires responsible entities to perform a function that is administrative in nature, does not support reliability, and is needlessly burdensome.
- The SDT notes that contact lists are administrative in nature and should not be part of a mandatory reliability standard.



- The SDT proposes several changes to the Event Type, Entity with Reporting Responsibility, and Threshold for Reporting in response to SAR comments and its own analyses.
- The proposed revisions:
  - Clarify appropriate Responsible Entity responsibilities
  - Eliminate duplicative reporting by the Generator Operator (GOP) and Balancing Authority (BA)
  - Clarify Generation loss criteria specific to Quebec Interconnection
  - Align reporting requirements with OE-417 and Electric Reliability Organization (ERO) Event Analysis Process where appropriate

- Event Type: “Bulk Electric System (BES) Emergency requiring system-wide voltage reduction”
- Revised Event Type to: “System-wide voltage reduction to maintain the continuity of the BES”
- Revised “Entity With Reporting Responsibility” from “Initiating Entity is responsible for reporting” to “TOP”
  - The TOP is operating the system and is the only entity that would implement system-wide voltage reduction.

- Event type “Generation loss”:
  - Removed GOP as a reporting entity, streamlining the reporting to the BA
  - Revised the generation loss for Quebec to  $\geq 2,000$  MW.
- The EOP SDT discussed dispersed power producing resources and their generation loss due to weather patterns or fuel source unavailability, but NERC confirmed that reporting of generation loss would be used to report Forced Outages not weather patterns or fuel source unavailability for these resources.

- Event type “Complete voice communication capability” revised to: “Complete loss of Interpersonal Communication capability at a BES control center”
- Threshold for Reporting revised to: “Complete loss of **Interpersonal Communication** capability affecting a **staffed** BES control center for 30 continuous minutes or more.”
- To align EOP-004-4 with COM-001-2.1. COM-001-2.1 defined Interpersonal Communication for the Glossary of Terms as: “Any medium that allows two or more individuals to interact, consult, or exchange information.”

- Event type “Complete loss of monitoring capability” revised to: “Complete loss of monitoring or control capability at a BES control center”
- Threshold for Reporting revised to: “Complete loss of monitoring **or control** at a BES control center for 30 continuous minutes or more.”
  - Provides clarity to the “Threshold for Reporting” and better aligns with the ERO Event Analysis Process.

- Propose to retire the following Event types from Attachment 1:
  - BES Emergency resulting in automatic firm load shedding (streamlining to one reporting category for both manual and automatic firm load shedding)
  - IROL Violation (all Interconnections) or SOL Violation for Major WECC Transfer Paths (WECC only)
    - Few reports due to TOP standards
    - TOP-001-3, Requirement R12 effective 4/1/17, requiring self-report if Tv is exceeded
    - TOP-007-WECC-1 pending retirement

- Propose to revisions the following event types:
  - “BES Emergency requiring Public appeal for load reduction” to “Public appeal for load reduction”
    - Reporting entity is now BA
    - Reporting Threshold is “Public appeal for load reduction to maintain continuity of the BES.”

- Propose to revisions the following event types:
  - “BES Emergency requiring manual firm load shedding” to “Firm load shedding resulting from a BES Emergency”
    - Reporting entity is now RC, BA, TOP
    - Reporting Threshold is “Firm load shedding  $\geq$  100 MW.”
    - One event type for both manual and automatic firm load shedding
  - “Voltage deviation on a Facility” to “BES Emergency resulting in voltage deviation on a Facility”
    - Reporting Threshold is “A voltage deviation of  $\pm$  10% of nominal voltage sustained for  $\geq$  15 continuous minutes.”



- Propose to revisions the following event types:
  - “Loss of firm load” to “Uncontrolled loss of firm load resulting from a BES Emergency”
  - Reporting Threshold is “Uncontrolled loss of firm load for  $\geq 15$  Minutes from a single incident:
    - $\geq 300$  MW for entities with previous year’s peak demand  $\geq 3,000$  MW
    - OR
    - $\geq 200$  MW for all other entities”

- A note was added to the header as a reminder:
  - Also submit to other organizations per Requirement R1 “... (e.g., the Regional Entity, company personnel, the Responsible Entity’s Reliability Coordinator, law enforcement, or Applicable Governmental Authority).”
- The “Event Identification and Description” section of Attachment 2 has been revised to reflect changes to the Event Types in Attachment 1.

- The EOP SDT has entered into collaborative efforts with the U.S. Department of Energy (DOE) to better align reporting requirements pursuant to EOP-004 and OE-417.
- The EOP SDT has discussed with DOE changes that would be necessary to EOP-004 Attachment 1 and to OE-417 to more closely align the two forms.
- The SDT and DOE have made significant progress in harmonizing reporting requirements, which would relieve many entities from having to report Reportable Events on both forms.
- **Regardless of whether OE-417 is harmonized with EOP-004 Attachment 1, entities will be required to report all Reportable Events as required by EOP-004.**

- EOP-004-4 is posted for a 45-day concurrent comment and ballot period through September 8, 2016.
- The EOP SDT will review and respond to comments and either re-post for a 45-day concurrent comment and ballot period or a 10-day final ballot depending on the outcome of the first ballot.
- EOP-004-4 will be presented to the NERC Board of Trustees for adoption in February 2017.

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# Questions and Answers