

Standards Authorization Request Form

When completed, email this form to:
Barbara.Nutter@nerc.net

For questions about this form or for assistance in completing the form, call Barb Nutter at 404-446-9692.

NERC welcomes suggestions for improving the reliability of the Bulk-Power System through improved Reliability Standards. Please use this form to submit your proposal for a new NERC Reliability Standard or a revision to an existing standard.

Request to propose a new or a revision to a Reliability Standard

Proposed Standard:	Project 2015-08 Emergency Operations (EOP-004-2, EOP-005-2, EOP-006-2, EOP-008-1)		
Date Submitted:	July 8, 2015		
SAR Requester Information			
Name:	David McRee, Chair of Project 2015-02 Emergency Operations Periodic Review Team		
Organization:	Duke Energy		
Telephone:	704-382-9841	E-mail:	David.McRee@duke-energy.com
SAR Type (Check as many as applicable)			
<input type="checkbox"/>	New Standard	<input type="checkbox"/>	Withdrawal of existing Standard
<input checked="" type="checkbox"/>	Revision to existing Standards	<input type="checkbox"/>	Urgent Action

SAR Information

Industry Need (What is the industry problem this request is trying to solve?):

The NERC Standard Processes Manual (see Section 13) obligates NERC to conduct Periodic Reviews of standards at a minimum interval of every ten years, with ANSI approved standards at five year intervals. NERC has responded to regulatory and industry guidance by incorporating into its Periodic Review process both principles of Results-based standards drafting and a review of each standard in relation to other standards to eliminate duplicative requirements. Additionally, Periodic Reviews evaluate whether each standard is clear, concise, and technically sound given current technologies and system conditions, whether any regulatory directives require specific changes to the standard, and whether requirements

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that do little to ensure the reliability of the Bulk-Power System should be eliminated. Periodic Reviews also consider previously-captured stakeholder-identified issues pertaining to the affected standards.

The Emergency Operations Periodic Review Team (EOP PRT) has reviewed and developed a recommendation based upon the language of Federal Energy Regulatory Commission (Commission) Order no. 749¹, as follows:

“[N]ERC, in its comments about the term, states that it “could promote the development of a guideline to aid registered entities in complying with Requirement R11.” The Commission notes that this Reliability Standard will not become effective for at least 24 months, during which time ambiguities in language or differences of opinion among affected entities may be resolved in practical ways. Once the Standard is effective, if industry determines that ambiguity with the term arises, it would be appropriate for NERC to consider its proposal to develop a guideline to aid entities in their compliance obligations.”²

Purpose or Goal (How does this request propose to address the problem described above?):

The primary goal of this SAR is to appoint a Standard Drafting Team (SDT) to address the directive of the Commission Order No. 749, Paragraph 24, for EOP-005-2, System Restoration from Blackstart Resources and to implement the recommendations of the Project 2015-02 EOP PRT to revise EOP-004-2, EOP-005-2, EOP-006-2, and EOP-008-1; as well as to implement the recommended requirement retirements in EOP-004-2 and EOP-006-2.

Identify the Objectives of the proposed standards’ requirements (What specific reliability deliverables are required to achieve the goal?):

Provide clear, unambiguous requirements and Results-based Reliability standards to address the recommendations of the EOP PRT.

Brief Description (Provide a paragraph that describes the scope of this standard action.)

The SDT shall consider the recommendations of the EOP PRT and revise standards, requirements, attachments, Violation Risk Factors, Violation Severity Levels, and implementation plans. The SDT shall consider retirements to requirements under Paragraph 81 criteria. In addition, the SDT shall work with compliance on an accompanying RSAW to address each of the standards’ requirements and measures

¹ *System Restoration Reliability Standards*, 134 FERC ¶61,215 (2011) (Order No. 749).

² *Id.* at P24.

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and shall address Commission Order no. 749, Paragraph 24, for EOP-005-2, System Restoration from Blackstart Resources.
Detailed Description (Provide a description of the proposed project with sufficient details for the standard drafting team to execute the SAR. Also provide a justification for the development or revision of the standard, including an assessment of the reliability and market interface impacts of implementing or not implementing the standard action.)
The SDTs execution of this SAR requires the SDT to address each recommendation of the EOP PRT, as well as the Commission directive in Order No. 749, Paragraph 24 for EOP-005-2, System Restoration. The SDTs execution of this SAR would, in addition, address the EOP PRT's recommendations of retirements to requirements under Paragraph 81 criteria. The reliability assessment and justification is also set forth in the final recommendations of the EOP PRT. The Commission Order, Paragraph 24 (for EOP-005-2) is incorporated in its entirety into this SAR, so as not to unnecessarily repeat or paraphrase the substance of the Order. There are no market interface impacts resulting from the standard action on the implementation of the Project 2015-02, EOP PRT's recommendations.

Reliability Functions	
The Standard will Apply to the Following Functions (Check each one that applies.)	
<input type="checkbox"/> Regional Reliability Organization	Conducts the regional activities related to planning and operations, and coordinates activities of Responsible Entities to secure the reliability of the Bulk Electric System within the region and adjacent regions.
<input checked="" type="checkbox"/> Reliability Coordinator	Responsible for the real-time operating reliability of its Reliability Coordinator Area in coordination with its neighboring Reliability Coordinator's wide area view.
<input checked="" type="checkbox"/> Balancing Authority	Integrates resource plans ahead of time, and maintains load-interchange-resource balance within a Balancing Authority Area and supports Interconnection frequency in real time.

Reliability Functions	
<input type="checkbox"/> Interchange Authority	Ensures communication of interchange transactions for reliability evaluation purposes and coordinates implementation of valid and balanced interchange schedules between Balancing Authority Areas.
<input type="checkbox"/> Planning Coordinator	Assesses the longer-term reliability of its Planning Coordinator Area.
<input type="checkbox"/> Resource Planner	Develops a >one year plan for the resource adequacy of its specific loads within a Planning Coordinator area.
<input type="checkbox"/> Transmission Planner	Develops a >one year plan for the reliability of the interconnected Bulk Electric System within its portion of the Planning Coordinator area.
<input type="checkbox"/> Transmission Service Provider	Administers the transmission tariff and provides transmission services under applicable transmission service agreements (e.g., the pro forma tariff).
<input checked="" type="checkbox"/> Transmission Owner	Owens and maintains transmission facilities.
<input checked="" type="checkbox"/> Transmission Operator	Ensures the real-time operating reliability of the transmission assets within a Transmission Operator Area.
<input checked="" type="checkbox"/> Distribution Provider	Delivers electrical energy to the End-use customer.
<input checked="" type="checkbox"/> Generator Owner	Owens and maintains generation facilities.
<input checked="" type="checkbox"/> Generator Operator	Operates generation unit(s) to provide real and reactive power.
<input type="checkbox"/> Purchasing-Selling Entity	Purchases or sells energy, capacity, and necessary reliability-related services as required.
<input type="checkbox"/> Market Operator	Interface point for reliability functions with commercial functions.
<input type="checkbox"/> Load-Serving Entity	Secures energy and transmission service (and reliability-related services) to serve the End-use Customer.

Reliability and Market Interface Principles

Applicable Reliability Principles (Check all that apply).

<input type="checkbox"/>	1. Interconnected bulk power systems shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions as defined in the NERC Standards.
<input type="checkbox"/>	2. The frequency and voltage of interconnected bulk power systems shall be controlled within defined limits through the balancing of real and reactive power supply and demand.
<input type="checkbox"/>	3. Information necessary for the planning and operation of interconnected bulk power systems shall be made available to those entities responsible for planning and operating the systems reliably.
<input checked="" type="checkbox"/>	4. Plans for emergency operation and system restoration of interconnected bulk power systems shall be developed, coordinated, maintained and implemented.
<input checked="" type="checkbox"/>	5. Facilities for communication, monitoring and control shall be provided, used and maintained for the reliability of interconnected bulk power systems.
<input checked="" type="checkbox"/>	6. Personnel responsible for planning and operating interconnected bulk power systems shall be trained, qualified, and have the responsibility and authority to implement actions.
<input checked="" type="checkbox"/>	7. The security of the interconnected bulk power systems shall be assessed, monitored and maintained on a wide area basis.
<input checked="" type="checkbox"/>	8. Bulk power systems shall be protected from malicious physical or cyber attacks.

Does the proposed Standard comply with all of the following Market Interface Principles?	Enter (yes/no)
1. A reliability standard shall not give any market participant an unfair competitive advantage.	Yes
2. A reliability standard shall neither mandate nor prohibit any specific market structure.	Yes
3. A reliability standard shall not preclude market solutions to achieving compliance with that standard.	Yes
4. A reliability standard shall not require the public disclosure of commercially sensitive information. All market participants shall have equal opportunity to access commercially non-sensitive information that is required for compliance with reliability standards.	Yes

Related Standards

Standard No.	Explanation

Related Standards	

Related SARs	
SAR ID	Explanation
N/A	N/A

Regional Variances	
Region	Explanation
ERCOT	N/A
FRCC	N/A
MRO	N/A
NPCC	N/A
RFC	N/A
SERC	N/A
SPP	N/A
WECC	N/A