



NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

April 2, 2008

Maureen Long
Standards Process Manager
North American Electric Reliability Corporation
116-390 Village Blvd.
Princeton, NJ 08540

Re: Formal Interpretation Request for Reliability Standard EOP-001-0, Requirement 1

Dear Maureen,

The Regional Entity Compliance Managers (RECM) request a formal interpretation of Reliability Standard EOP-001-0 — Emergency Operations Planning Requirement R1 in accordance with the Reliability Standards Development Procedure.

Material Impact: A formal interpretation is required for Regional Entities to consistently assess compliance with this standard and to ensure Registered Entities are meeting their obligation and responsibility as intended by the standard.

Clarification is needed for Reliability Standard EOP-001-0 Requirement R1 which states:

- R1.** Balancing Authorities shall have operating agreements with adjacent Balancing Authorities that shall, at a minimum, contain provisions for emergency assistance, including provisions to obtain emergency assistance from remote Balancing Authorities.

Specifically, the RECM requests an interpretation and clarity for the following language listed in EOP-001-0, Requirement 1:

1. What is the definition of emergency assistance in the context of this standard? What scope and time horizons, if any, are considered necessary in this definition?
2. What was intended by using the adjective “adjacent” in Requirement 1? Does “adjacent” Balancing Authorities mean “All” or something else? Is there qualifying criteria to determine if a very small adjacent Balancing Authority area has enough capacity to offer emergency assistance?
3. What is the definition of the word “remote” as stated in the last phrase of Requirement 1? Does remote mean every Balancing Authority who’s area does not physically touch the Balancing Authority attempting to comply with this Requirement?

4. Would a Balancing Authority that participates in a Reserve Sharing Group Agreement, which meets the requirements of Reliability Standard BAL-002-0, Requirement 2, be required to establish additional operating agreements to achieve compliance with Reliability Standard EOP-001-0, Requirement 1?

If you have any questions concerning this request please contact Susan Morris, Manager of Regional Compliance Program Oversight at susan.morris@nerc.net or (609) 240-6784.

Sincerely,

Regional Entity Compliance Managers:

Barry Pagel, Florida Reliability Coordinating Council
Stanley Kopman, Northeast Power Coordinating Council
Wayne VanOsdol, Midwest Reliability Organization
Ray Palmieri, ReliabilityFirst Corporation
Tom Galloway, SERC Reliability Corporation
Ron Ciesiel, Southwest Power Pool Regional Entity
Mark Henry, Texas Regional Entity
Steve McCoy, Western Electricity Coordinating Council

CC: David Taylor
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