

A. Introduction

1. **Title:** Loss of Control Center Functionality
2. **Number:** EOP-008-2
3. **Purpose:** Ensure continued reliable operations of the Bulk Electric System (BES) in the event that a control center becomes inoperable.
4. **Applicability:**
 - 4.1. **Functional Entities:**
 - 4.1.1. Reliability Coordinator
 - 4.1.2. Transmission Operator
 - 4.1.3. Balancing Authority
5. **Effective Date:** See the Implementation Plan for EOP-008-2.
6. **Standard-Only Definition:** None

B. Requirements and Measures

- R1. Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have a current Operating Plan describing the manner in which it continues to meet its functional obligations with regard to the reliable operations of the BES in the event that its primary control center functionality is lost. This Operating Plan for backup functionality shall include: *[Violation Risk Factor = Medium] [Time Horizon = Operations Planning]*
 - 1.1. The location and method of implementation for providing backup functionality.
 - 1.2. A summary description of the elements required to support the backup functionality. These elements shall include:
 - 1.2.1. Tools and applications to ensure that System Operators have situational awareness of the BES.
 - 1.2.2. Data exchange capabilities.
 - 1.2.3. Interpersonal Communications.
 - 1.2.4. Power source(s).
 - 1.2.5. Physical and cyber security.
 - 1.3. An Operating Process for keeping the backup functionality consistent with the primary control center.
 - 1.4. Operating Procedures, including decision authority, for use in determining when to implement the Operating Plan for backup functionality.
 - 1.5. A transition period between the loss of primary control center functionality and the time to fully implement the backup functionality that is less than or equal to two hours.

- 1.6.** An Operating Process describing the actions to be taken during the transition period between the loss of primary control center functionality and the time to fully implement backup functionality elements identified in Requirement R1, Part 1.2. The Operating Process shall include:
- 1.6.1.** A list of all entities to notify when there is a change in operating locations.
 - 1.6.2.** Actions to manage the risk to the BES during the transition from primary to backup functionality, as well as during outages of the primary or backup functionality.
 - 1.6.3.** Identification of the roles for personnel involved during the initiation and implementation of the Operating Plan for backup functionality.
- M1.** Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have a dated, current, and in effect Operating Plan for backup functionality in accordance with Requirement R1, in electronic or hardcopy format.
- R2.** Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have a copy of its current Operating Plan for backup functionality available at its primary control center and at the location providing backup functionality. *[Violation Risk Factor = Lower] [Time Horizon = Operations Planning]*
- M2.** Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have a dated, current, and in effect copy of its Operating Plan for backup functionality in accordance with Requirement R2, in electronic or hardcopy format, available at its primary control center and at the location providing backup functionality.
- R3.** Each Reliability Coordinator shall have a backup control center facility (provided through its own dedicated backup facility or at another entity's control center staffed with certified Reliability Coordinator operators when control has been transferred to the backup facility) that provides the functionality required for maintaining compliance with all Reliability Standards are applicable to the primary control center functionality. To avoid requiring a tertiary facility, a backup facility is not required during: *[Violation Risk Factor = High] [Time Horizon = Operations Planning]*
- Planned outages of the primary or backup facilities of two weeks or less
 - Unplanned outages of the primary or backup facilities
- M3.** Each Reliability Coordinator shall provide dated evidence that it has a backup control center facility (provided through its own dedicated backup facility or at another entity's control center staffed with certified Reliability Coordinator operators when control has been transferred to the backup facility) that provides the functionality required for maintaining compliance with all Reliability Standards that are applicable to the primary control center functionality in accordance with Requirement R3.
- R4.** Each Balancing Authority and Transmission Operator shall have backup functionality (provided either through a facility or contracted services staffed by applicable certified operators when control has been transferred to the backup functionality

location) that includes monitoring, control, logging, and alarming sufficient for maintaining compliance with all Reliability Standards that are applicable to a Balancing Authority's and Transmission Operator's primary control center functionality. To avoid requiring tertiary functionality, backup functionality is not required during: *[Violation Risk Factor = High] [Time Horizon = Operations Planning]*

- Planned outages of the primary or backup functionality of two weeks or less
 - Unplanned outages of the primary or backup functionality
- M4.** Each Balancing Authority and Transmission Operator shall provide dated evidence that its backup functionality (provided either through a facility or contracted services staffed by applicable certified operators when control has been transferred to the backup functionality location) includes monitoring, control, logging, and alarming sufficient for maintaining compliance with all Reliability Standards that are applicable to a Balancing Authority's or Transmission Operator's primary control center functionality in accordance with Requirement R4.
- R5.** Each Reliability Coordinator, Balancing Authority, and Transmission Operator, shall annually review and approve its Operating Plan for backup functionality. *[Violation Risk Factor = Medium] [Time Horizon = Operations Planning]*
- 5.1.** An update and approval of the Operating Plan for backup functionality shall take place within sixty calendar days of any changes to any part of the Operating Plan described in Requirement R1.
- M5.** Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have evidence that its dated, current, and in effect Operating Plan for backup functionality, in electronic or hardcopy format, has been reviewed and approved annually and that it has been updated within sixty calendar days of any changes to any part of the Operating Plan described in Requirement R1 in accordance with Requirement R5.
- R6.** Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have primary and backup functionality that do not depend on each other for the control center functionality required to maintain compliance with Reliability Standards. *[Violation Risk Factor = Medium] [Time Horizon = Operations Planning]*
- M6.** Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have dated evidence that its primary and backup functionality do not depend on each other for the control center functionality required to maintain compliance with Reliability Standards in accordance with Requirement R6.
- R7.** Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall conduct and document results of an annual test of its Operating Plan that demonstrates: *[Violation Risk Factor = Medium] [Time Horizon = Operations Planning]*
- 7.1.** The transition time between the simulated loss of primary control center functionality and the time to fully implement the backup functionality.
- 7.2.** The backup functionality for a minimum of two continuous hours.

- M7.** Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall provide evidence such as dated records, that it has completed and documented its annual test of its Operating Plan for backup functionality, in accordance with Requirement R7.
- R8.** Each Reliability Coordinator, Balancing Authority, and Transmission Operator that has experienced a loss of its primary or backup functionality and that anticipates that the loss of primary or backup functionality will last for more than six calendar months shall provide a plan to its Regional Entity within six calendar months of the date when the functionality is lost, showing how it will re-establish primary or backup functionality. *[Violation Risk Factor = Medium] [Time Horizon = Operations Planning]*
- M8.** Each Reliability Coordinator, Balancing Authority, and Transmission Operator that has experienced a loss of their primary or backup functionality and that anticipates that the loss of primary or backup functionality will last for more than six calendar months shall provide evidence that a plan has been submitted to its Regional Entity within six calendar months of the date when the functionality is lost showing how it will re-establish primary or backup functionality in accordance with Requirement R8.

C. Compliance

1. Compliance Monitoring Process

1.1. Compliance Enforcement Authority:

“Compliance Enforcement Authority” means NERC or the Regional Entity, or any entity as otherwise designated by an Applicable Governmental Authority, in their respective roles of monitoring and/or enforcing compliance with mandatory and enforceable Reliability Standards in their respective jurisdictions.

1.2. Evidence Retention:

The following evidence retention period(s) identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full-time period since the last audit.

The applicable entity shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

- Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall retain its dated, current, in effect Operating Plan for backup functionality plus all issuances of the Operating Plan for backup functionality since its last compliance audit in accordance with Measurement M1.
- Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall retain a dated, current, in effect copy of its Operating Plan for backup functionality, with evidence of its last issue, available at its primary control center and at the location providing backup functionality, for the current year, in accordance with Measurement M2.
- Each Reliability Coordinator shall retain dated evidence for the time period since its last compliance audit, that it has demonstrated that it has a backup control center facility (provided through its own dedicated backup facility or at another entity’s control center staffed with certified Reliability Coordinator operators when control has been transferred to the backup facility) in accordance with Requirement R3 that provides the functionality required for maintaining compliance with all Reliability Standards that are applicable to the primary control center functionality in accordance with Measurement M3.
- Each Balancing Authority and Transmission Operator shall retain dated evidence for the time period since its last compliance audit, that it has demonstrated that it’s backup functionality (provided either through a facility or contracted services staffed by applicable certified operators

when control has been transferred to the backup functionality location) in accordance with Requirement R4 includes monitoring, control, logging, and alarming sufficient for maintaining compliance with all Reliability Standards that are applicable to a Balancing Authority's and Transmission Operator's primary control center functionality in accordance with Measurement M4.

- Each Reliability Coordinator, Balancing Authority, and Transmission Operator, shall retain evidence for the time period since its last compliance audit, that its dated, current, in effect Operating Plan for backup functionality, has been reviewed and approved annually and that it has been updated within sixty calendar days of any changes to any part of the Operating Plan described in Requirement R1 in accordance with Measurement M5.
- Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall retain dated evidence for the current year and for any Operating Plan for backup functionality in effect since its last compliance audit, that its primary and backup functionality do not depend on each other for the control center functionality required to maintain compliance with Reliability Standards in accordance with Measurement M6.
- Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall retain evidence for the current calendar year and the previous calendar years, such as dated records, that it has tested its Operating Plan for backup functionality, in accordance with Measurement M7.
- Each Reliability Coordinator, Balancing Authority, and Transmission Operator that has experienced a loss of their primary or backup functionality and that anticipates that the loss of primary or backup functionality would last for more than six calendar months shall retain evidence for the current in effect document and any such documents in effect since its last compliance audit that a plan has been submitted to its Regional Entity within six calendar months of the date when the functionality is lost showing how it will re-establish primary or backup functionality in accordance with Measurement M8.

1.3. Compliance Monitoring and Enforcement Program

As defined in the NERC Rules of Procedure, "Compliance Monitoring and Enforcement Program" refers to the identification of the processes that will be used to evaluate data or information for the purpose of assessing performance or outcomes with the associated Reliability Standard.

Violation Severity Levels

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
R1.	The responsible entity had a current Operating Plan for backup functionality, but the plan was missing one of the requirement's six parts (Requirement R1, Parts 1.1 through 1.6).	The responsible entity had a current Operating Plan for backup functionality, but the plan was missing two of the requirement's six parts (Requirement R1, Parts 1.1 through 1.6).	The responsible entity had a current Operating Plan for backup functionality, but the plan was missing three of the requirement's six parts (Requirement R1, Parts 1.1 through 1.6).	The responsible entity had a current Operating Plan for backup functionality, but the plan was missing four or more of the requirement's six parts (Requirement R1, Parts 1.1 through 1.6) OR The responsible entity did not have a current Operating Plan for backup functionality.
R2.	N/A	The responsible entity did not have a copy of its current Operating Plan for backup functionality available in at least one of its control locations.	N/A	The responsible entity did not have a copy of its current Operating Plan for backup functionality at any of its locations.
R3.	N/A	N/A	N/A	The Reliability Coordinator does not have a backup control center facility (provided through its own dedicated backup facility or at another entity's control

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
				center staffed with certified Reliability Coordinator operators when control has been transferred to the backup facility) that provides the functionality required for maintaining compliance with all Reliability Standards that are applicable to the primary control center functionality.
R4.	N/A	N/A	N/A	The responsible entity does not have backup functionality (provided either through a facility or contracted services staffed by applicable certified operators when control has been transferred to the backup functionality location) that includes monitoring, control, logging, and alarming sufficient for maintaining compliance with all Reliability Standards that are applicable to a Balancing Authority's and Transmission Operator's

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
				primary control center functionality.
R5.	The responsible entity did not update and approve its Operating Plan for backup functionality for more than 60 calendar days and less than or equal to 70 calendar days after a change to any part of the Operating Plan described in Requirement R1.	The responsible entity did not update and approve its Operating Plan for backup functionality for more than 70 calendar days and less than or equal to 80 calendar days after a change to any part of the Operating Plan described in Requirement R1.	The responsible entity did not update and approve its Operating Plan for backup functionality for more than 80 calendar days and less than or equal to 90 calendar days after a change to any part of the Operating Plan described in Requirement R1.	The responsible entity did not have evidence that its Operating Plan for backup functionality was annually reviewed and approved. OR, The responsible entity did not update and approve its Operating Plan for backup functionality for more than 90 calendar days after a change to any part of the Operating Plan described in Requirement R1.
R6.	N/A	N/A	N/A	The responsible entity has primary and backup functionality that do depend on each other for the control center functionality required to maintain compliance with Reliability Standards.
R7.	The responsible entity conducted an annual test of	The responsible entity conducted an annual test of	The responsible entity conducted an annual test of	The responsible entity did not conduct an annual test

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
	<p>its Operating Plan for backup functionality, but it did not document the results.</p> <p>OR,</p> <p>The responsible entity conducted an annual test of its Operating Plan for backup functionality, but the test was for less than two continuous hours but more than or equal to 1.5 continuous hours.</p>	<p>its Operating Plan for backup functionality, but the test was for less than 1.5 continuous hours but more than or equal to 1 continuous hour.</p>	<p>its Operating Plan for backup functionality, but the test did not assess the transition time between the simulated loss of its primary control center and the time to fully implement the backup functionality</p> <p>OR,</p> <p>The responsible entity conducted an annual test of its Operating Plan for backup functionality, but the test was for less than 1 continuous hour but more than or equal to 0.5 continuous hours.</p>	<p>of its Operating Plan for backup functionality.</p> <p>OR,</p> <p>The responsible entity conducted an annual test of its Operating Plan for backup functionality, but the test was for less than 0.5 continuous hours.</p>
R8.	<p>The responsible entity experienced a loss of its primary or backup functionality and anticipated that the loss of primary or backup functionality would last for more than six calendar months and provided a plan to its</p>	<p>The responsible entity experienced a loss of its primary or backup functionality and anticipated that the loss of primary or backup functionality would last for more than six calendar months provided a plan to its Regional Entity</p>	<p>The responsible entity experienced a loss of its primary or backup functionality and anticipated that the loss of primary or backup functionality would last for more than six calendar months provided a plan to its Regional Entity</p>	<p>The responsible entity experienced a loss of its primary or backup functionality and anticipated that the loss of primary or backup functionality would last for more than six calendar months, but did not submit a plan to its Regional</p>

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
	Regional Entity showing how it will re-establish primary or backup functionality but the plan was submitted more than six calendar months but less than or equal to seven calendar months after the date when the functionality was lost.	showing how it will re-establish primary or backup functionality but the plan was submitted in more than seven calendar months but less than or equal to eight calendar months after the date when the functionality was lost.	showing how it will re-establish primary or backup functionality but the plan was submitted in more than eight calendar months but less than or equal to nine calendar months after the date when the functionality was lost.	Entity showing how it will re-establish primary or backup functionality for more than nine calendar months after the date when the functionality was lost.

D. Regional Variances

None.

E. Associated Documents

[Link](#) to the Implementation Plan and other important associated documents.

Version History

Version	Date	Action	Change Tracking
1	2009 - 2010	Project 2006-04: Revisions	Major re-write to accommodate changes noted in project file
1	August 5, 2010	Project 2006-04: Adopted by the Board	
1	April 21, 2011	Project 2006-04: FERC Order issued approving EOP-008-1 (approval effective June 27, 2011)	
1	July 1, 2013	Project 2006-04: Updated VRFs and VSLs based on June 24, 2013 approval	
2	July 9, 2017	Adopted by the NERC Board of Trustees	Revised
2	January 18, 2018	FERC order issued approving EOP-008-2. Docket No. RM17-12-000.	

Rationale

Rationale for Requirement R1: The phrase "data exchange capabilities" is replacing "data communications" in Requirement R1, Part 1.2.2 for the following reasons:

COM-001-1 (no longer enforceable) covered telecommunications, which could be viewed as covering both voice and data. COM-001-2.1 (currently enforceable) focuses on "Interpersonal Communication" and does not address data.

The topic of data exchange has historically been covered in the IRO / TOP Standards. Most recently the revisions to the standards that came out of Project 2014-03 Revisions to TOP and IRO Standards use the phrase "data exchange capabilities." The rationale included in the IRO-002-4 standard discusses the need to retain the topic of data exchange, as it is not addressed in the COM standards.