

Event Analysis Process Update Webinar

Questions and Answers

1. Please confirm the effective date of version 2.

The effective date is October 1, 2013.

2. Why do we need to report events under EAP when we have to report events under EOP-004-2 starting January 1?

The ERO Event Analysis Process (EAP) is not a reporting process rather it is an analysis process. EOP-004-2 is a NERC Reliability Standard that requires disturbance reporting. The EAP asks for an analysis of the event and identification of lessons learned (LLs). The analysis associated with the EAP will provide more depth on the causes of events and allow the ERO to develop high level trends and provide feedback to registered entities. I realize that the standard uses the term "reporting" but in one of the EAS meetings it was clearly pointed out that both the EOP and the OE-417 reports are more of a "notification" process that something happened without going into a great amount of detail. One of the purposes of the EA process is to uncover the detail and determine if there is anything that can be done to prevent it from occurring in the future. That type of analysis cannot be done in notifications that are due within a 24 hour period.

3. Is an entity allowed to self-define "significantly affects the entity's ability to make operating decisions"?

Yes, the registered entity will need to identify these events and consider whether or not the event "significantly affects the entity's ability to make operating decisions".

4. I still wonder about Cat 1h - does my definition of significance only concern the actual operating conditions I experienced, or should I consider events that could have happened (the nuclear model).

The intent of this category is to analyze actual events that significantly affect the entity's ability to make operating decisions. Near misses which provide valuable LLs may always be analyzed using the ERO Event Analysis Process (EAP).

5. So the decision I had to make was due to an operational issue and not a postulated event? Actual events drive the determination of significance.

Yes, that is the decision of the registered entities.

6. Is the use of "sustained outage" the NERC-defined term? It sounded like it is from what you described.

The use of "sustained outage" in the ERO EAP is similar to the NERC-defined term with one exception. The NERC-defined term implies that operator intervention may take place by stating "unsuccessful manual reclosing procedure". The use of sustained outage in the EAP only considers auto reclose and not operator actions since that is a normal part of restoration.

Sustained Outage: *"The reenergized condition of a transmission line resulting from a fault or disturbance following an unsuccessful automatic reclosing sequence and/or unsuccessful manual reclosing procedure."*

- 7. A single nuclear unit in the ERCOT Region is rated at 1,375 MW, so even the tripping of a single nuclear unit by the proper operation of the protection system would be a reportable event, Category 1g. Thus, the ERCOT Region is set up by the EA Process to report a straightforward N-1 occurrence. Please explain the need for Category 1g.**

The MW threshold in Category 1g is based on the size of the interconnection and the frequency response needed. This threshold also lines up with EOP-004. For this type of event, you should consult with the Texas Reliability Entity (TRE) Event Analysis contact person as an EOP-004 report may be sufficient.

- 8. EAP Meeting/Coordination (Step 2) says "For category 4 and 5 events refer to "Special Considerations for Category 4 and 5 Events" below", however there are no such considerations listed. The items a - f apply to any categorized event.**

The section referenced in Step 2 - "Event Analysis Planning Meeting/Coordination" was deleted. The last sentence of the last paragraph on page 6 will be struck ("For category 4 & 5 events refer to "Special Considerations for Category 4 and 5 Events" below").

- 9. We thought this was required under NERC ROP, is EA voluntary? It was just mentioned that reporting is voluntary, but a few Regional Entities have been tough on why we didn't report on an event.**

The NERC Rules of Procedure (ROP) do not include a reference to the ERO EAP and there are no NERC Reliability Standards that require analysis using the EAP. Sections 807 and 808 of the NERC ROP discuss NERC and the Regional Entity responsibility to screen and analyze events that they become aware of.

- 10. Are compliance reviews of EA reports still being done by the Regions?**

Yes. Registered entities are encouraged to provide a Reliability Standards Assessment to their Compliance Enforcement Authority.

- 11. Can you discuss why the focus of the EA Program is on promoting the reliability of the Bulk-Power System, as opposed to the Bulk Electric System (BES)?**

The ERO EAP drafting team was advised to use the term Bulk-Power System (BPS) by the NERC legal department.

- 12. Are there any changes to the event reporting categories? I ask because the lowest level category (3 or more BES elements) could be read quite broadly.**

There were changes to Category 1a to clarify intent:

- *Category 1a: The word "facility" was added.*
- *Category 1ai: The word "sustained" was added.*
- *Category 1aai: The word "outage" was added. The statement "each combined cycle unit is counted as one generator" was added.*

Please consult with your Regional Entity Event Analysis contact person for further clarification on the specific category of interest.

13. Will the LLs ever be presented by category or subject matter and not by a list published by year? Digesting the full portfolio of LLs will become more difficult with time.

The ERO has future plans to develop an online database of LLs with search capabilities.

14. What's expected from the "Lesson Learned" report; just information only?

Follow up to question: The review team reached out to the person who asked the question to clarify the intent of the question. The requester is asking what is the expectation of registered entities with respect to published LLs? Are the published LLs just for information? Is NERC expecting feedback from registered entities?

The objective of the EAP is to share information on events throughout the industry in an effort to reduce repeat events. The registered entity is asked to review the events and LLs that may have applicability to them and, as appropriate, take actions to ensure a similar event will not occur at their site. There is no requirement to provide feedback on what actions a registered entity may have taken with regard to the LLs. If there are LLs that rise to that level then the NERC Alerts System may be utilized.

In addition, the EAS is continuously seeking feedback from registered entities to improve the effectiveness of the program. Each published LL has a link at the bottom that will take the reader to a survey where they may provide recommendations for improvement and feedback on the usefulness of that particular LL document.

15. Is there a final state intention for the EA Process to be in sync with the NERC Disturbance Reporting requirements to allow the industry to be a bit more efficient?

Yes, There is currently a technology effort to develop an online reporting portal that will allow registered entities to report EOP-004, OE-417, and ERO EAP reports through the same tool.

16. So is the intent only to know root cause, lessons learned or possible non-compliance ?

The intent of the ERO EAP is to determine the cause(s) and contributing factors leading to industry events, identify appropriate corrective actions and share this information in the form of LLs with others in the industry with the goal of preventing similar events in the future.

17. Loss of 600 MW Generator station (six units) with only one line (same as combined cycle exclusion)

If the event is an N-1 event as described then it will not qualify for a Category 1ai event. Please consult with your Regional Entity Event Analysis contact person to discuss specific events and configurations to ensure agreement.

18. On the false line out indication - did the manufacturer specify this output contacts as open collector type? If so this is an application problem, if not it's a manufacturer documentation issue. Do you know which this was?

This was described as a misapplication due to a documentation issue. The contact was an electromechanical contact with solid state circuitry in parallel with the contact. The vendor did not have anything in their literature referencing any limitations on this type of contact. Thus, the entity

applied the contact as they would any other electromechanical contact. NERC consulted with the manufacturer for the LL and they are developing an application guide for their contacts that should help entities avoid this in the future.