

Individual or group. (25 Responses)

Name (15 Responses)

Organization (15 Responses)

Group Name (10 Responses)

Lead Contact (10 Responses)

IF YOU WISH TO EXPRESS SUPPORT FOR ANOTHER ENTITY'S COMMENTS WITHOUT ENTERING ANY ADDITIONAL COMMENTS, YOU MAY DO SO HERE. (0 Responses)

Comments (25 Responses)

Question 1 (24 Responses)

Question 1 Comments (25 Responses)

Question 2 (22 Responses)

Question 2 Comments (25 Responses)

Question 3 (22 Responses)

Question 3 Comments (25 Responses)

Question 4 (15 Responses)

Question 4 Comments (25 Responses)

Group
Northeast Power Coordinating Council
Guy Zito
No
EOP-001 R6.4 should be deleted. There should already be processes in place to deliver electrical energy. This should be left to the generators using normal processes.
Yes
EOP-001-2.1.b Attachment 1 should be further reviewed as it relates to the GOP in light of recent BES events, specifically Cold Weather Events. Also, add EOP-003 into the merger of EOP-001 & EOP-002. It seems to me that the justification for merging EOP-001-2.b (Emergency Operations Planning) and EOP-002-3.1 (Capacity and Energy Emergencies) into one standard (which I agree with) would also apply to including EOP-003-3 (Load Shedding Plans) in the merger. There are redundancies between EOP-001 and EOP-003 that could be eliminated. With the recommended elimination of R2, R4, R5, R6 & R7 from EOP-003-2, there would only be three requirements (R1, R3 & R8) to merge into EOP-001. Recommend that the remaining requirements (R1, R3 & R8) be merged into EOP-001.
Individual
Nazra Gladu
Manitoba Hydro
Yes
Yes
Yes
Yes
Individual
John Seelke
Public Service Enterprise Group
No
We disagree with the statement on p. 4 regarding a review of "Attachment 1 as it relates to the GOP in light of recent BES events (Cold Weather Event)." An effort was initiated in Project 2013-01 Cold Weather, but that project was halted due to inadequate stakeholder support. Nevertheless, item #10 in Attachment 1-EOP-001 does need to be reworded because as written because a BA or TOP plan cannot include "plans to winterize units and plants during extreme cold weather" because a BA or TOP has no control over generators with regard to their winterization efforts. We offer this change to the second sentence which would make it acceptable for compliance by a BA or TOP: "This should include recommendations to generating resources to winterize units and plants in preparation for extreme cold weather." Since the statement above is the only issue that would involve a Generator Operator, if it is changed as recommended we also recommend removing Generator Operator from the first sentence on p. 4 – the phrase "Transmission Operator, Generator Operator, and Reliability Coordinator" should be replaced with "Transmission Operator, Balancing Authority, and Reliability Coordinator."

Yes
Yes
No
Individual
Michelle R. D'Antuono
Occidental Energy Ventures Corp. (representing Oxy's NERC registered entities)
No
Occidental Energy Ventures Corp supports the strategy the review team has taken to eliminate ambiguity in emergency operations planning. It is clear that a significant amount of redundancy exists in the standards – and there is a pressing need to specify the roles that operating entities must play in the process. However, it was our understanding that Generator Operator preparedness for an extreme cold weather event – originally captured in Project 2013-01 – had been deferred to the local authorities (e.g.; the Public Utility Commissions). With the intense attention they have put on this issue since the 2011 winter storm in the Southwest U.S., it is not clear that we should add redundant continent-wide requirements – particularly because the approach varies considerably by locale. It serves no useful purpose to scrutinize the cold weather preparedness plans of northern-based GOPs, which are far more routine events at the higher latitudes. Furthermore, per the direction of the RISC, NERC issued a Cold Weather Guideline earlier this year.
Individual
Michael Falvo
Independent Electricity System Operator
No
We do not agree with the removal of EOP-001-2.1b, R3.2 for the following reasons: a. Attachment 1 of this standard lists items for consideration to be included in an emergency plan. R3.2 is important because it says that an emergency plan shall include a list of controlling actions to resolve the emergency (in our case, this is the EOSCA list). b. Load reduction timelines are not as explicit in BAL-002 R2, as it is in EOP-001-2.1b R3.2 c. BAL-002 only applies to BAs – whereas EOP-001-2.1b applies to TOPs and BAs. Emergencies apply to both adequacy shortfalls as well as transmission-related issues.
No
We agree with the recommendation for R1, but not for R6 and R9. We want to point out that retiring R6 may result in not having a requirement anywhere regarding the actions needed when a BA fails to meet DCS since the latest draft BAL-002-2 does not have this requirement or convey any needs for remedial actions when a BA fails to meet DCS. We suggest the 5-Year Review Team or the SDT to keep this in mind and re-evaluate the need to keep or remove R6. Regarding R9, the technology change allows removal of a good number of the sub-requirements, but there is a need for the LSE to request the RC to issue a EEA, which may not be covered by the e-tag spec and/or other automatic communication protocol. We suggest the 5-Year Review Team or the SDT to re-evaluate this.
Yes
We agree with the proposed retirement of R6, and the mapping of R2, R4 and R7 to another standard, but suggest that the 5-Year Review Team or the SDT consider revising R1 to take care of some of the detailed requirement in R6 which implies manual load shedding after UFLS operations. We do not agree with the removal of EOP-003-2 R5 because this requirement implies that any manual load shedding to be implemented shall not include any load that is also connected to UFLS relays. This detail is not mentioned in R1, as the EOP FYRT have recommended. We suggest to include this detail (excluding load that is selected for UFLS) in R1 if the SDT wishes to retire R5. In addition, R6 as written addresses frequency problems and the results of UFLS operations only. R1 as written does not make this distinction, and it asks for load shedding – automatic and/or manual, to address transmission and resource problems. Without R6 and without revising R1, Responsible Entities may simply rely on automatic load shedding schemes (UFLS and UVLS) to address transmission and resource concerns without taking the next steps to implement manual load shedding after the automatic load shedding operations. We suggest the 5-Year Review Team or the SDT to assess the scope of R1, and revise it as necessary to cover both transmission and resource aspects using automatic and manual load shedding as remedial measures.
Individual
David Thorne
Pepco Holdings Inc
Yes

Yes
Yes
No
Individual
Bill Fowler
City of Tallahassee
Yes
Yes
Yes
Individual
Dave Willis
Idaho Power Company
Yes
Yes
Yes
Yes
Idaho Power likes the realistic look at standards for Performance-based results. The elimination of the redundant requirements makes revising these standards a worthwhile project.
Group
Dominion
Connie Lowe
Yes
No
Dominion does not agree that R6 is redundant with BAL-002-1a. Only R6.1 and R6.2 could be considered to be redundant (and even then, implicitly, not explicitly).
Yes
Yes
Dominion does not agree with adding GOP to the suggested combination of EOP-001-2.b and EOP-002-3.1. Nothing in the purpose statements of the cited standards, or the FERC directives relative to these standards indicates that reliability would be improved by expanding to these functions. It is the responsibility of the entities responsible for 'wide area' reliability (BA, RC and TOP) to insure that they request operating information necessary for them to carry out their functions. These already have the authority to require GO/GOPs provide information requested and to follow the instructions given in reliability standards IRO-001-3, TOP-001-2, and TOP-003-2.
Individual
Thomas Foltz
American Electric Power
Yes
Yes
Yes

Individual
Alice Ireland
Xcel Energy
No
R3.3 to identify coordinated tasks should also be looked at to be retired. It is potentially redundant with R6 to coordinate plans since presumably if plans were coordinated, the tasks beneath each plan would be coordinated as well.
Yes
Yes
Yes
Attachment 1 of EOP-001-2.1b needs to be clarified for responsibilities of all applicable entities. As written it is unclear what items BAs and TOPs should be responsible for. Additionally, Attachment 1 should be reviewed for redundancy as well. Items 1, 2, and 7 have significant overlap since the fuel supply and inventory plan probably includes fuel switching capabilities and optimizing fuel supply. Items 4, 5, 6, 9, 12, 13 all cover load curtailment or load management and are too specific. These items should be combined with general guidelines for what is expected when considering load management. Items 3, 10, and 11 also have substantial overlap.
Group
PacifiCorp
Kelly Cumiskey
Yes
Yes
Yes
No
PacifiCorp appreciates the opportunity to provide input for this project and looks forward to the next step in the process.
Group
SERC OC Review Group
Jim Case
Yes
EOP-001-2.1b R1 should eliminate the obligation for BAs to establish "provisions for obtaining emergency assistance from remote BAs." Regardless of the definition of "remote" as addressed in the interpretation, reliability standards do not need to impose a requirement on BAs to pre-arrange sources of emergency assistance from non-adjacent BAs. In fact, adjacency should not be a parameter addressed by the Requirement, as long as adequate delivery arrangements are in place. Consider eliminating R2.3 due to the redundancy with EOP-003-2 and PRC-010-0 We understand that R4 will be included in the merger of EOP-001-2.1b and EOP-002-3.1.
Yes
R7 requires revision if R6 is retired. Current R7: Once the Balancing Authority has exhausted the steps listed in Requirement 6, or if these steps cannot be completed in sufficient time to resolve the emergency condition, the Balancing Authority shall: Would the FYRT provide further clarification on whether R8 is solely applicable to RC actions regarding issuing of alerts? If not consider splitting the requirement. Example follows: R8. A Reliability Coordinator that has any Balancing Authority within its Reliability Coordinator area experiencing a potential or actual Energy Emergency shall initiate an Energy Emergency Alert as detailed in Attachment 1-EOP-002 "Energy Emergency Alerts." Possible new Requirement: "The Reliability Coordinator shall act to mitigate the emergency condition, including a request for emergency assistance if required."
Yes
The FYRT is requested to consider renaming the standard to reflect the execution focus of the standard with the proposed revisions.
EOP-008-1: Please consider recommending a revision of EOP-008-1 to allow planned loss of redundancy for periods greater than two weeks without requiring the construction of a tertiary facility. As unplanned losses of redundancy are allowed to extend for six months before requiring a resolution plan to be submitted to the RE [R8], it does not make sense to restrict maintenance activities to only those that can be executed in under two weeks without requiring tertiary facilities to be constructed [R3 and R4, bullet one]. EOP-005-2: Consider retiring EOP-005-2, R2.1, as it appears redundant with NUC-001-2. Training: The FYRT is requested to review and eliminate any training requirements in the EOP standards (not

reviewed during the 5 year process) as they are covered in the PER standards. The comments expressed herein represent a consensus of the views of the above named members of the SERC OC Review Group only and should not be construed as the position of the SERC Reliability Corporation, or its board or its officers.

Individual

Andrew Gallo

City of Austin dba Austin Energy

Yes

Yes

Yes

Yes

Austin Energy (AE) provides the following for consideration: (1) Attachment 1 should be reviewed and revised to provide clarity as to which elements apply to the TOP and which to the BA. (2) Add clarifying language to indicate whether the "emergency plans" in R3-R6 are those "operating agreements" and "set[s] of plans" required by R1 and R2, respectively. As currently used, the term "emergency plans" is broad and undefined.

Group

Duke Energy

Colby Bellville

Yes

Yes

With the understanding that BAL-001-2 will ultimately become enforceable, pending BOT and FERC approval, Duke Energy agrees with the removal of R6.

Yes

Individual

Karen Webb

City of Tallahassee - Electric Utility

Yes

Yes

Yes

Yes

Individual

Bob Thomas

Illinois Municipal Electric Agency

Yes

Yes

Illinois Municipal Electric Agency (IMEA) appreciates the EOP Five-Year Review Team's comprehensive review and recommendations. NERC's uniform objectives and process for review and development of high quality, results-based Reliability Standards is very encouraging. IMEA comments were limited to EOP-002 since that is the only EOP standard applicable to one of our registered functions.

Individual

Christina Conway

Oncor Electric Delivery

Yes
Oncor concurs with the EOP FYRT recommendations. However, Oncor further suggests the inclusion of the following additional recommendations. In alignment with one of the Paragraph 81 objectives to remove duplication in the Standards, with EOP-003 specifically covering load shedding and EOP-005 specifically covering system restoration from Blackstart Resources, Oncor recommends the incorporation of specific language into EOP-001 excluding both load shedding plans and system restoration plans, ultimately removing the redundancy between EOP-001 and both EOP-003 and EOP-005. Additionally, although Oncor agrees with the EOP FYRT that the Measures section needs review, Oncor specifically recommends that the Measures section expands to better align to each Requirement creating a clear tie back from Measurement to Requirement.
Yes
Yes
Similar to EOP-001, Oncor agrees with the EOP FYRT that the Measures section needs review. Oncor specifically recommends that the Measures section expands to better align to each Requirement creating a clear tie back from Measurement to Requirement.
Group
Florida Municipal Power Agency
Frank Gaffney
No
R2, 2.1 is redundant with EOP-002, should not apply to TOPs, and should be deleted R2, 2.3 is redundant with EOP-003 and should be deleted FMPA supports merging EOP-001 with EOP-002, but, wonder is there ought to also be some changes to EOP-003 and EOP-005 to accommodate the requirements applicable in EOP-001 to TOPs.
No
R1 is possibly the only requirement that gives the BA clear decision making authority. If that is the case, it should not be deleted without modifying another standard to give the BA that authority. We appreciate the recognition of the overlap of this standard with the BAL standards. We encourage the team to also see if there is overlap with the NAESB WEQ standard on Transmission Loading Relief concerning R9.
Yes
FMPA also wonders if EOP-003 can become a TOP only standard for manual load shedding since load shedding for BAs is really only for capacity/energy emergencies and should be part of EOP-002.
Group
ACES Standards Collaborators
Ben Engelby
No
(1) We agree with the Five Year Review Team (FYRT) recommendations to retire several requirements under Paragraph 81 criteria and to combine EOP-001 and EOP-002. However, we still have additional comments for revising EOP-001, which are stated below. (2) The Commission directed EOP-001 to be revised to have a clear delineation between the TOP and BA actions. We do not see how these directives are being answered or accounted for in the proposed revisions. (3) Requirement R1: We recommend including revisions to capitalize "adjacent BAs" to reflect the NERC glossary term. (4) Requirement R2: EOP-001-2.1b R2.3 is redundant with EOP-003-1 R8 and meets P81 criteria B7. (5) Requirement R3: We question the recommendation to leave R3.3 intact in the standard. This sub-requirement is ambiguous. What does "coordinate tasks" mean? Several requirements require "coordination" (R3.3, R6). Does R1 satisfy coordination? If there are operating agreements in place as required in R1, then there must have been some sort of coordination, which would render the additional tasks as being redundant under Paragraph 81 criteria B7. Further, there are multiple interpretations of what constitutes coordination, and if an auditor determines that there should be an additional task included in the coordination, there could be compliance implications. We also have concerns that the term "adjacent TOPs and BAs" could have multiple interpretations. While there is a glossary term for "Adjacent Balancing Authority," there is not a defined term for the TOP. We ask the FYRT to consider making a recommendation to revise the standard to clarify coordination aspects and adjacent entities. (6) Requirement R5: Annual reviews are administrative in nature and meet P81 criteria B1. Further, there is additional inconsistent language between "adjacent" and "neighboring" entities within this standard. The requirement is ambiguous and could be misinterpreted to include other entities than those identified by the applicable TOP and BA. (7) Requirement R6: If the sub-requirements are retired under P81, then the entire requirement should be retired. R1 would satisfy any other tasks that remain in R6. (8) We agree that VSLs for R1 are ambiguous and support their revision. How would an entity determine that 25% of the "adjacent" BAs or TOPs were not coordinated with or an operating agreement did not exist? Furthermore, the VSLs do not reflect what is needed for reliability. Consider a small 100 MW BA that is interconnected to a large 50,000 MW BA and another small BA with 150 MW of load. Not having an agreement with the large BA would be a reliability concern. An agreement with the small adjacent BA would do little to support reliability and is not a reliability concern. Yet, the VSLs imply that the 100 MW BA would be in violation of the requirement for not having an agreement with both BAs. These VSLs need to be revised as well. (9) The FYRT should also

recommend revising the standard to address the interpretations. A standard should not go through the standards development process and retain any interpretations. The FYRT should include this aspect in its recommendation. (10) Any modifications to EOP-001 R1 should be carefully considered and should avoid the need for BA to immediately re-negotiate their operating agreements. If changes are made to the requirement that compel certain elements to be included, any operating agreement that does not include these agreements will have to be renegotiated.

No

(1) We agree with the FYRT for retiring several requirements under P81 criteria and combining EOP-001 and EOP-002. However, we have additional comments for revising EOP-002 for consideration. (2) R1: we agree with the recommendation to retire R1. (3) R2: Wouldn't the implementation of an emergency plan be included in EOP-001 R1? This requirement should be removed because it is redundant. If a BA did not take appropriate actions to reduce an emergency "as described in its plan" the BA would be in violation of EOP-001 R1. This requirement poses double jeopardy risk. (4) R3: How does a BA communicate "future system conditions" to its RC? This phrase is impossible to comply with, because communicating future conditions could only be a projection of what may occur. How far into the future? Five minutes? Three hours? Two weeks? The BA should only be required to communicate current system conditions, as that is all they could possibly know. (5) R4: In this requirement, the BA that has recognized its system conditions could lead to an emergency and should follow its emergency operating plan, which is required in EOP-001 R1. There is no need for this requirement. Again, this requirement poses a double jeopardy risk. (6) R5: This requirement is redundant with BAL-002 which requires a BA to recover from the loss of a resource within 15 minutes and the 30-minute BAAL limits established in the new BAL-001-2. (7) R6: We agree with the recommendation to retire R6 and offer additional support for its retirement. Many of the actions stated are not appropriate to comply with DCS as they may be contrary to necessary actions to support reliability or they simply aren't timely. For instance, literally loading all available generation may result in an overgeneration situation per R6.1 Reduction of load through public appeals is not going to be effective in time to respond to DCS as it takes time to issue a public appeal and then for the public to respond. Curtailing firm loads is an inappropriate response to comply with DCS or to return ACE to balance if there are no SOL or IROL violations, no indication of stability issues and no frequency issues. Curtailment of firm load is a serious issue and should only be performed when necessary to address imminent reliability threats. Failing to return ACE to zero is not necessarily an imminent reliability threat. (8) R7: If R6 is retired, R7 should be retired as well because it is dependent upon R6. R7 states, "Once the BA has exhausted the steps listed in R6..." Manual firm load shedding is covered by EOP-003 and is also covered in R6.6 which covers reducing load through "curtailing ... firm loads", and is therefore redundant. Declaring an EEA should be in the BA's emergency plan and does not need to be a separate requirement. Furthermore, manually shedding firm load is a serious reliability issue and should only be performed to address imminent reliability threats and should not be performed for the sole purpose of returning ACE to zero per R7.1 unless there are other conditions to indicate a significant threat to reliability such as an SOL or IROL violation or low frequency. Shedding load for the sole purpose of returning ACE to zero will result in less reliability not more because end load will be interrupted unnecessarily at time. Furthermore, the R7.1 does not even reflect the DCS requirement that the BA should return its ACE to the lower of its pre-disturbance value or zero. (9) R8: Wouldn't R8 fall under the RC emergency plan? This is another requirement that does not need to be a separate requirement. (10) R9: We agree with the recommendation to retire R9 not only because the need is obviated by the updated E-tag spec but primarily because it is in fact a business practice and deals with prioritizing transmission service per FERC approved tariffs. Deficient BA can rely on their operating agreements in EOP-001 R1 to address energy and capacity deficiencies. (11) Finally, EOP-002 does not have VSLs, VRFs, or Time Horizons. These elements should be added when the standard is revised.

No

(1) While we agree that there are several requirements that should be retired, we have additional comments for revising EOP-003. (2) R1: This requirement should be combined with R8 for having a plan to shed load. Both requirements compel load shed to respond to similar situations. R1 requires responding to an "uncontrolled failure" or "cascading outages" while R8 requires response to "real-time emergencies." "Uncontrolled failure" and "cascading outages" would constitute real-time emergencies. The only other difference is that R8 compels that the load shed must be timely. That is implied in R1. Responsible Entities should be subject to complying with its load shedding plan. (3) We agree that R2, R4, and R7 should be incorporated with PRC-010. (4) R3: Similar to R2 (UVLS), why did the FYRT not recommend moving R3 to PRC-006 for UFLS? (5) We agree that R5 and R6 should be retired under P81 criteria. (6) R8: as stated above, we ask the FYRT to consider recommending that R1 and R8 be combined to address load shedding by having a plan for both automatic and manual load shedding and to comply with its plan. (7) We agree with the FYRT that measures and data retention should be reviewed and updated.

Yes

(1) We question why the team has not reviewed the other EOP standards. There are multiple requirements in the other EOP standards that would also meet Paragraph 81 criteria and should be revised. The five year review team should take this opportunity to make recommendations for the entire set of EOP standards. (2) We also recommend that the review team take the Independent Expert Review into consideration. There are several EOP modifications based on the expert's recommendations. We are concerned that the review teams are not aware of or did not consider these expert recommendations. (3) Thank you for the opportunity to comment.

Individual

Andrew Z. Pusttai

American Transmission Company, LLC

Yes

Yes
Group
Southern Company
Wayne Johnson
Yes
Southern agrees with the SERC OC comments.
Yes
Southern agrees with the SERC OC comments.
Yes
Southern agrees with the SERC OC comments.
Yes
Southern agrees with the SERC OC comments.
Individual
Scott Langston
City of Tallahassee
Yes
Yes
Yes
Group
SPP Standards Review Group
Robert Rhodes
No
We recommend retiring R2.3 in EOP-001-2.1b since it is redundant with EOP-003-2. We support the effort to combine EOP-001 and EOP-002.
No
The Independent Experts Review Project recommended that R2 and R3 of EOP-002 be retired. This recommendation needs to be factored into the 5-Year Review Team's recommendations. Also, with the proposed retirement of R6, R7 needs to be revised to eliminate the reference to R6 and should instead refer to criteria spelled out in Attachment 1. In this process, R7.1 needs to be retired since it is redundant with EOP-003-2.
No
We recommend that the coordination of load shedding plans as called for in R3 be expanded upon such that it clarifies what the expectation for coordination is. For example, if it's simply sharing load shedding plans, it should be retired just as R5 in EOP-001-2.1b was. Perhaps a revised measure would add the needed clarity. Regardless, it needs to be clearer just what the expectation is. We support the recommendation to move R2, R4 and R7 to PRC-010.
No
Group
ISO/RTO Council Standards Review Committee
Greg Campoli
Yes
No
We agree with the recommendation for R1, but not for R6 and R9. Retiring R6 may result in not having a requirement anywhere regarding the actions needed when a BA fails to meet DCS since the latest draft BAL-002-2 does not have this requirement or convey any needs for remedial actions when a BA is unable to meet DCS. We suggest the 5-Year Review Team or the SDT to keep this in mind and re-evaluate the need to keep or remove R6. Regarding R9, the technology change allows removal of a good number of the sub-requirements, but there is a need for the LSE to request the RC to



issue an EEA, which may not be covered by the e-tag spec and/or other automatic communication protocol. We suggest the 5-Year Review Team or the SDT to re-evaluate this. Note: PJM, ISO-NE and CAISO do not support this comment.

Yes

We agree with the proposed retirement of R5 and R6, and the mapping of R2, R4 and R7 to another standard, but suggest that the 5-Year Review Team or the SDT consider revising R1 to take care of some of the detailed requirement in R6 which implies manual load shedding after UFLS operations. R6 as written addresses frequency problems and the results of UFLS operations only. R1 as written does not make this distinction, and it asks for load shedding – automatic and/or manual, to address transmission and resource problems. Without R6 and without revising R1, Responsible Entities may simply rely on automatic load shedding schemes (UFLS and UVLS) to address transmission and resource concerns without taking the next steps to implement manual load shedding after the automatic load shedding operations. We suggest the 5-Year Review Team or the SDT to assess the scope of R1, and revise it as necessary to cover both transmission and resource aspects using automatic and manual load shedding as remedial measures. We further suggest the 5-Year Review Team or the SDT consider merging EOP-003-2 (Load Shedding Plans) into EOP-001-2.b (Emergency Operations Planning). The justification for the 5-Year Review Team proposal to merge EOP-002-3.1 (Capacity and Energy Emergencies) into EOP-001-2.b also applies to merging EOP-003-3 into EOP-001-2.b. This would eliminate redundancies between EOP-001 and EOP-003. With the recommended elimination of R2, R4, R5, R6 & R7 from EOP-003-2, there would only be three requirements (R1, R3 & R8) left to merge into EOP-001.

No