

Meeting Agenda EOP FYRT

January 14, 2014 | 8:30 a.m. – 5:00 p.m. Eastern

January 15, 2014 | 8:30 a.m. – 5:00 p.m. Eastern

January 16, 2014 | 8:30 a.m. – 2:00 p.m. Eastern

NERC
3353 Peachtree Road NE
Suite 600, North Tower
Atlanta, GA 30326

Meeting Dial-in Information:

Phone: 1-866-740-1260 | Meeting Code: 7686935 | Security Code: 0114

Administrative

1. **NERC Antitrust Compliance Guidelines, Public Announcement, Participant Conduct Policy, and Email List Policy***
2. **Introductions**
3. **Meeting Logistics**
4. **Meeting Agenda and Objectives**

Agenda Items

1. **Working Documents – Review and Discussion**
 - a. Standard Authorization Request*
 - b. Straw Man Standards*
 - c. Standards (EOP-001-2.1b, EOP-002-3.1, EOP-003-2)*
 - d. Outstanding Directives*
 - e. Review of Comments – Standard Authorization Request*
2. **Develop Draft Standards**
3. **Develop Draft**
 - a. Implementation Plan
 - b. Mapping Document
 - c. Consideration of Directives

4. Next Steps- Review

- a. Review/revise Acton Plan*

5. Future Meeting Dates

6. Adjourn

*Background materials included

Antitrust Compliance Guidelines

I. General

It is NERC's policy and practice to obey the antitrust laws and to avoid all conduct that unreasonably restrains competition. This policy requires the avoidance of any conduct that violates, or that might appear to violate, the antitrust laws. Among other things, the antitrust laws forbid any agreement between or among competitors regarding prices, availability of service, product design, terms of sale, division of markets, allocation of customers or any other activity that unreasonably restrains competition.

It is the responsibility of every NERC participant and employee who may in any way affect NERC's compliance with the antitrust laws to carry out this commitment.

Antitrust laws are complex and subject to court interpretation that can vary over time and from one court to another. The purpose of these guidelines is to alert NERC participants and employees to potential antitrust problems and to set forth policies to be followed with respect to activities that may involve antitrust considerations. In some instances, the NERC policy contained in these guidelines is stricter than the applicable antitrust laws. Any NERC participant or employee who is uncertain about the legal ramifications of a particular course of conduct or who has doubts or concerns about whether NERC's antitrust compliance policy is implicated in any situation should consult NERC's General Counsel immediately.

II. Prohibited Activities

Participants in NERC activities (including those of its committees and subgroups) should refrain from the following when acting in their capacity as participants in NERC activities (e.g., at NERC meetings, conference calls and in informal discussions):

- Discussions involving pricing information, especially margin (profit) and internal cost information and participants' expectations as to their future prices or internal costs.
- Discussions of a participant's marketing strategies.
- Discussions regarding how customers and geographical areas are to be divided among competitors.
- Discussions concerning the exclusion of competitors from markets.
- Discussions concerning boycotting or group refusals to deal with competitors, vendors or suppliers.

- Any other matters that do not clearly fall within these guidelines should be reviewed with NERC's General Counsel before being discussed.

III. Activities That Are Permitted

From time to time decisions or actions of NERC (including those of its committees and subgroups) may have a negative impact on particular entities and thus in that sense adversely impact competition. Decisions and actions by NERC (including its committees and subgroups) should only be undertaken for the purpose of promoting and maintaining the reliability and adequacy of the bulk power system. If you do not have a legitimate purpose consistent with this objective for discussing a matter, please refrain from discussing the matter during NERC meetings and in other NERC-related communications.

You should also ensure that NERC procedures, including those set forth in NERC's Certificate of Incorporation, Bylaws, and Rules of Procedure are followed in conducting NERC business.

In addition, all discussions in NERC meetings and other NERC-related communications should be within the scope of the mandate for or assignment to the particular NERC committee or subgroup, as well as within the scope of the published agenda for the meeting.

No decisions should be made nor any actions taken in NERC activities for the purpose of giving an industry participant or group of participants a competitive advantage over other participants. In particular, decisions with respect to setting, revising, or assessing compliance with NERC reliability standards should not be influenced by anti-competitive motivations.

Subject to the foregoing restrictions, participants in NERC activities may discuss:

- Reliability matters relating to the bulk power system, including operation and planning matters such as establishing or revising reliability standards, special operating procedures, operating transfer capabilities, and plans for new facilities.
- Matters relating to the impact of reliability standards for the bulk power system on electricity markets, and the impact of electricity market operations on the reliability of the bulk power system.
- Proposed filings or other communications with state or federal regulatory authorities or other governmental entities.

Matters relating to the internal governance, management and operation of NERC, such as nominations for vacant committee positions, budgeting and assessments, and employment matters; and procedural matters such as planning and scheduling meetings.

Public Announcements

REMINDER FOR USE AT BEGINNING OF MEETINGS AND CONFERENCE CALLS THAT HAVE BEEN PUBLICLY NOTICED AND ARE OPEN TO THE PUBLIC

Conference call version:

Participants are reminded that this conference call is public. The access number was posted on the NERC website and widely distributed. Speakers on the call should keep in mind that the listening audience may include members of the press and representatives of various governmental authorities, in addition to the expected participation by industry stakeholders.

NERC Email List Policy

NERC provides email lists, or “listservs,” to NERC committees, groups, and teams to facilitate sharing information about NERC activities; including balloting, committee, working group, and drafting team work, with interested parties. All emails sent to NERC listserv addresses must be limited to topics that are directly relevant to the listserv group’s assigned scope of work. NERC reserves the right to apply administrative restrictions to any listserv or its participants, without advance notice, to ensure that the resource is used in accordance with this and other NERC policies.

Prohibited activities include using NERC-provided listservs for any price-fixing, division of markets, and/or other anti-competitive behavior.¹ Recipients and participants on NERC listservs may not utilize NERC listservs for their own private purposes. This may include announcements of a personal nature, sharing of files or attachments not directly relevant to the listserv group’s scope of responsibilities, and/or communication of personal views or opinions, unless those views are provided to advance the work of the listserv’s group. Use of NERC’s listservs is further subject to NERC’s Participant Conduct Policy for the Standards Development Process.

- *Updated December 2012*

¹ Please see NERC’s Antitrust Compliance Guidelines for more information about prohibited antitrust and anti-competitive behavior or practices. This policy is available at <http://www.nerc.com/commondocs.php?cd=2>

Standards Authorization Request Form

When completed, please email this form to:
sarcomm@nerc.com

NERC welcomes suggestions to improve the reliability of the bulk power system through improved reliability standards. Please use this form to submit your request to propose a new or a revision to a NERC's Reliability Standard.

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

Title of Proposed Standard: Emergency Operations (EOP-001-3, EOP-002-4, EOP-003-3)

Date Submitted: October 17, 2013

SAR Requester Information

Name: David McRee, Chair EOP Five-Year Review Team (FYRT)

Organization: Duke Energy

Telephone: (704) 382-9841

E-mail: David.McRee@duke-energy.com

SAR Type (Check as many as applicable)

New Standard

Withdrawal of existing Standard

Revision to existing Standard

Urgent Action

SAR Information

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

This SAR will address the Five-Year Review requirement for these standards.

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

To improve the quality, relevance, and clarity of the standards. Also bring the standards into the Results Based Standards format.

Standards Authorization Request Form

SAR Information	
Identify the Objectives of the proposed standard's requirements (What specific reliability deliverables are required to achieve the goal?):	
To increase the effectiveness of the three standards in their ability to ensure reliability of the BES.	
Brief Description (Provide a paragraph that describes the scope of this standard action.)	
<p>The EOP SDT will consider the comments received from the EOP Five Year Review Team (FYRT), which includes consideration of industry comments and the report from the Industry Expert Review Panel.</p> <p>Recommendations for consideration are:</p> <ul style="list-style-type: none"> • Modify the requirements and attachments to improve their clarity and measurability, while removing ambiguity • Move and/or streamline requirements • Eliminate requirements based on P81 criteria • Coordinate with Project 2008-02 UVLS to eliminate duplicative requirements • Apply Paragraph 81 criteria and recommendations from Independent Expert Review Panel on standards EOP-001, -002, and -003. <p>To ensure a seamless transition from the EOP FYRT to the future EOP SDT, the EOP FYRT recommends the inclusion of interested EOP FYRT members to participate on the EOP SDT. In addition, the EOP FYRT should provide a high-level overview of their recommendations as a formal kick-off to the future EOP SDT meetings.</p>	
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.)	
See the attached Five-Year Review templates of the three standards, consideration of comments, issues and directives list, redlined standards (reflecting deletions), and the Industry Experts' analysis.	

Reliability Functions	
The Standard will Apply to the Following Functions (Check each one that applies.)	
<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.

Standards Authorization Request Form

Reliability Functions	
<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.
<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 type="checkbox"/> Transmission Owner	Owns 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 type="checkbox"/> Distribution Provider	Delivers electrical energy to the End-use customer.
<input type="checkbox"/> Generator Owner	Owns 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 checked="" 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

Standards Authorization Request Form

Reliability and Market Interface Principles	
Applicable Reliability Principles (Check all that apply).	
<input checked="" 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 checked="" 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 type="checkbox"/>	5. Facilities for communication, monitoring and control shall be provided, used and maintained for the reliability of interconnected bulk power systems.
<input 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 type="checkbox"/>	7. The security of the interconnected bulk power systems shall be assessed, monitored and maintained on a wide area basis.
<input 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

Standards Authorization Request Form

Related Standards	
Standard No.	Explanation
BAL-001-0.1a	Real Power Balancing Control Performance
BAL-002-01	Disturbance control standard
BAL-002-WECC	Regional Contingency Reserve standard
COM-001-1.1	Telecommunications
COM-002-2	Communications and Coordination
PRC-010-0	Planning for Undervoltage Load shedding
PER-005-1	Training

Related SARs	
SAR ID	Explanation
	None

Regional Variances	
Region	Explanation
ERCOT	

Standards Authorization Request Form

Regional Variances	
FRCC	
MRO	
NPCC	
RFC	
SERC	
SPP	
WECC	

Five-Year Review Template – EOP-001-2.1b

Submitted to Standards Committee October 17, 2013

Introduction

NERC has an obligation to conduct a five-year review of each Reliability Standard developed through NERC's American National Standards Institute-accredited Reliability Standards development process.¹ The Reliability Standard identified below is due for a five-year review. Your review team should use the background information and the questions below, along with any associated worksheets or reference documents, to guide a comprehensive review that results in a recommendation that the Reliability Standard should be (1) affirmed as is (i.e., no changes needed); (2) revised (which may include revising or retiring one or more requirements); or (3) withdrawn. If the team recommends a revision to the Reliability Standard, it should also submit a draft Standard Authorization Request (SAR) outlining the proposed scope and technical justification for the revision.

A completed five-year review template and any associated documentation should be submitted by email to Laura Hussey, Director of Standards Development at laura.hussey@nerc.net.

Applicable Reliability Standard: EOP-001-2.1b Emergency Operations Planning

Team Members (include name, organization, phone number, and email address):

1. Chair - David McRee, Duke Energy, 704-382-9841, david.mcree@duke-energy.com
2. Vice Chair – Francis Halpin, Bonneville Power, 503-230-7545, fjhalpin@bpa.gov
3. Richard Cobb, Midcontinent ISO, Inc., 651-632-8468, rcobb@misoenergy.org
4. Jen Fiegel, Oncor Electric, 214-743-6825, jfiegel1@oncor.com
5. Hal Haugom, Madison Gas & Electric, 608-252-5608, hhaugom@mge.com
6. Steve Lesiuta, Ontario Power Generation, 416-231-4111, ext. 4034, steve.lesiuta@opg.com
7. Connie Lowe, Dominion Resources Services, Inc., 804-819-2917, connie.lowe@dom.com
8. Brad Young, LG&E/KU, 859-367-5703, brad.young@lge-ku.com

Date Review Completed: September 24, 2013

¹ NERC Standard Processes Manual, posted at http://www.nerc.com/files/Appendix_3A_Standard_Processes_Manual_20110825.pdf, at page 41.

Background Information (to be completed by NERC staff)

1. Are there any outstanding Federal Energy Regulatory Commission directives associated with the Reliability Standard? (If so, NERC staff will attach a list of the directives with citations to associated FERC orders for inclusion in a SAR.)

Yes

No

2. Have stakeholders requested clarity on the Reliability Standard in the form of an Interpretation (outstanding, in progress, or approved), Compliance Application Notice (CAN) (outstanding, in progress, or approved), or an outstanding submission to NERC's Issues Database? (If there are, NERC staff will include a list of the Interpretation(s), CAN(s), or stakeholder-identified issue(s) contained in the NERC Issues Database that apply to the Reliability Standard.)

Yes

No

3. Is the Reliability Standard one of the most violated Reliability Standards? If so, does the root cause of the frequent violation appear to be a lack of clarity in the language?

Yes

No

Please explain:

4. Does the Reliability Standard need to be converted to the results-based standard format as outlined in *Attachment 1: Results-Based Standards*? (Note that the intent of this question is to ensure that, as Reliability Standards are reviewed, the formatting is changed to be consistent with the current format of a Reliability Standard. If the answer is yes, the formatting should be updated when the Reliability Standard is revised.)

Yes

No

Questions for SME Review Team

If NERC staff answered “Yes” to any of the questions above, the Reliability Standard probably requires revision. The questions below are intended to further guide your review. Some of the questions reference documents provided by NERC staff as indicated in the Background questions above.

1. **Paragraph 81:** Does one or more of the requirements in the Reliability Standard meet criteria for retirement or modification based on Paragraph 81 concepts? Use *Attachment 2: Paragraph 81 Criteria* to make this determination.

Yes

No

Please summarize your application of Paragraph 81 Criteria, if any:

Requirement R3:

- Requirement R3.1 should be covered by EOP-001-2.1b Requirement R4 in Attachment 1 (notifications that should be included in the plan are identified). COM-001 and COM-002 are descriptive in the identification of protocols to use and, thus, adequately cover the generic reference. With the recommended revision to Attachment 1 of EOP-001-2.1b, along with COM-001 and COM-002 generic reference, Requirement R3.1 would meet Criterion B7 as redundant, as well as Criterion A (Requirement R3.1 does little, if anything, to benefit or protect the reliable operation of the BES) of Paragraph 81 and should be retired.
- Requirement R3.2 should be covered by EOP-001-2.1b Requirement R4 in Attachment 1, which lists the actions to take during capacity situations specified in the plan. Load reduction within timelines is covered in BAL-002 Requirement R2. With the recommended revision of EOP-001 Requirement R4, Requirement R3.2 would meet Criterion B7 as redundant, as well as Criterion A (R3.1 does little, if anything, to benefit or protect the reliable operation of the BES) of Paragraph 81 and should be retired.
- Requirement R3.4 meets Paragraph 81 Criterion B1; staffing levels are administrative in nature and would result in an increase in efficiency in the ERO compliance program (it is a simple check off during an audit). Requirement R3.4 also meets with Criterion A of Paragraph 81, as a check-off does not enhance the reliability of the BES. Requirement R3.4 should be retired as falling under Criterion B1 and Criterion A of Paragraph 81.

Requirement 6 in its entirety:

- Requirement R6.1 is redundant with COM-001, meeting Criterion B7 as redundant under Paragraph 81 and should be retired.
- Requirement R6.2 speaks to an action to be taken during capacity issues that is not feasible in accomplishing. Transaction arrangements are also a commercial practice and, thus, Requirement R6.2 meets Criterion B6 of Paragraph 81 and should be retired.

- Requirement R6.3 is redundant with EOP-001-2b Requirement R4 and Attachment 1, whereby meeting Criterion B7 as redundant under Paragraph 81 and should be retired.
- Requirement R6.4 does not provide for benefit for reliability of the BES, meeting Criterion A of Paragraph 81 and should be retired.

2. **Clarity:** If the Reliability Standard has an Interpretation, CAN, or issue associated with it, or is frequently violated because of ambiguity, it probably needs to be revised for clarity. Beyond these indicators, is there any reason to believe that the Reliability Standard should be modified to address a lack of clarity? Consider:

- a. Is this a Version 0 Reliability Standard?
- b. Does the Reliability Standard have obviously ambiguous language or language that requires performance that is not measurable?
- c. Are the requirements consistent with the purpose of the Reliability Standard?

Yes

No

Please summarize your assessment:

The 2009-03 Emergency Operations Five-Year Review Team (EOP FYRT) recommends that EOP-001-2.b and EOP-002-3.1 be revised and merged into a single standard identifying clearly and separately the Transmission Operator, Generation Operator and Reliability Coordinator issues as they relate to the BA and TOP (to address Paragraph 548 of Order 693) and how it needs to be planned and implemented for on the BES by the specific functional entities.

- Requirement R1 needs clarity provided as to what an operating agreement constitutes, and adjust the VSL to reflect current interpretations with the number of agreements needed. Requirement R1 must also account for current interpretations found in the Appendix and other interpretations.
- Requirement R2 needs clarity provided, as instructed by the Commission, on the ambiguity of the EOP standards as they relate to the responsibilities of the Transmission Operator and Balancing Authority.
- Requirement R5, the need to share emergency plans with neighboring Transmission Operators and Balancing Authorities, should be removed as an administrative burden (identified in P81); however, the remaining language of the requirement should be affirmed.
- Review is recommended for Attachment 1 as it relates to the GOP in light of recent BES events (Cold Weather Event).

3. **Definitions:** Do any of the defined terms used within the Reliability Standard need to be refined?

Yes

No

Please explain:

Appendix 1 attempts to define what a remote Balancing Authority is and should be addressed in future revisions of the Standard

4. **Compliance Elements:** Are the compliance elements associated with the requirements (Measures, Data Retention, VRFs, and VSLs) consistent with the direction of the Reliability Assurance Initiative and FERC and NERC guidelines? If you answered “No,” please identify which elements require revision, and why:

Additional measures must be provided with this standard. There are no performance measures. There are no VRFs with this standard. Requirement R1, once recommended clarity is provided as to what an operating agreement constitutes, adjustment to the VSL will be necessary to reflect current interpretations with the number of agreements needed.

Yes

No

5. **Consistency with Other Reliability Standards:** Does the Reliability Standard need to be revised for formatting and language consistency among requirements within the Reliability Standard or consistency with other Reliability Standards? If you answered “Yes,” please describe the changes needed to achieve formatting and language consistency:

Yes

No

6. **Changes in Technology, System Conditions, or other Factors:** Does the Reliability Standard need to be revised to account for changes in technology, system conditions, or other factors? If you answered “Yes,” please describe the changes and specifically what the potential impact is to reliability if the Reliability Standard is not revised:

Yes

No

7. **Consideration of Generator Interconnection Facilities:** Is responsibility for generator interconnection Facilities appropriately accounted for in the Reliability Standard?

Yes

No

Guiding Questions:

If the Reliability Standard is applicable to GOs/GOPs, is there any ambiguity about the inclusion of generator interconnection Facilities? (If generation interconnection Facilities could be perceived to be excluded, specific language referencing the Facilities should be introduced in the Reliability Standard.)

If the Reliability Standard is not applicable to GOs/GOPs, is there a reliability-related need for treating generator interconnection Facilities as transmission lines for the purposes of this Reliability Standard? (If so, GOs and GOPs that own or operate relevant generator interconnection Facilities should be explicit in the applicability section of the Reliability Standard.)

Recommendation

The answers to the questions above, along with a preliminary recommendation of the SMEs conducting the review of the Reliability Standard, will be posted for a 45-day informal comment period, and the comments publicly posted. The SMEs will review the comments to evaluate whether to modify their initial recommendation, and will document the final recommendation which will be presented to the Standards Committee.

Preliminary Recommendation (to be completed by the SME team after its review and prior to posting the results of the review for industry comment):

- AFFIRM
- REVISE – Requirement R1, R2, R5 and Attachment 1
- RETIRE – Requirements R3.1, R3.2, R3.4, R6.1, R6.2, R6.3, R6.4

Technical Justification *(If the SME team recommends that the Reliability Standard be revised, a draft SAR may be included and the technical justification included in the SAR):*

Preliminary Recommendation posted for industry comment (date): 08/06/2013 – 09/19/2013

Final Recommendation (to be completed by the SME team after it has reviewed industry comments on the preliminary recommendation):

- AFFIRM *(This should only be checked if there are no outstanding directives, interpretations or issues identified by stakeholders.)*
- REVISE – Requirements R1, R2, R5 and Attachment 1
- RETIRE – Requirements R3.1, R3.2, R3.4; Requirement R6 in its entirety; R6.1, R6.2, R6.3, R6.4

Technical Justification *(If the SME team recommends that the Reliability Standard be revised, a draft SAR may be included and the technical justification included in the SAR):*

Date submitted to NERC Staff:

Attachment 1: Results-Based Standards

The fourth question for NERC staff asks if the Reliability Standard needs to be converted to the results-based standards (RBS) format. The information below will be used by NERC staff in making this determination, and is included here as a reference for the SME team and other stakeholders.

RBS standards employ a defense-in-depth strategy for Reliability Standards development where each requirement has a role in preventing system failures and the roles are complementary and reinforcing. Reliability Standards should be viewed as a portfolio of requirements designed to achieve an overall defense-in-depth strategy and comply with the quality objectives identified in the resource document titled, "[Acceptance Criteria of a Reliability Standard](#)."

A Reliability Standard that adheres to the RBS format should strive to achieve a portfolio of performance-, risk-, and competency-based mandatory reliability requirements that support an effective defense-in-depth strategy. Each requirement should identify a clear and measurable expected outcome, such as: a) a stated level of reliability performance, b) a reduction in a specified reliability risk, or c) a necessary competency.

- a. **Performance-Based**—defines a particular reliability objective or outcome to be achieved. In its simplest form, a results-based requirement has four components: who, under what conditions (if any), shall perform what action, to achieve what particular result or outcome?
- b. **Risk-Based**—preventive requirements to reduce the risks of failure to acceptable tolerance levels. A risk-based reliability requirement should be framed as: who, under what conditions (if any), shall perform what action, to achieve what particular result or outcome that reduces a stated risk to the reliability of the bulk power system?
- c. **Competency-Based**—defines a minimum set of capabilities an entity needs to have to demonstrate it is able to perform its designated reliability functions. A competency-based reliability requirement should be framed as: who, under what conditions (if any), shall have what capability, to achieve what particular result or outcome to perform an action to achieve a result or outcome or to reduce a risk to the reliability of the bulk power system?

Additionally, each RBS-adherent Reliability Standard should enable or support one or more of the eight reliability principles listed below. Each Reliability Standard should also be consistent with all of the reliability principles.

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.

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.
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.
4. Plans for emergency operation and system restoration of interconnected bulk power systems shall be developed, coordinated, maintained, and implemented.
5. Facilities for communication, monitoring, and control shall be provided, used, and maintained for the reliability of interconnected bulk power systems.
6. Personnel responsible for planning and operating interconnected bulk power systems shall be trained, qualified, and have the responsibility and authority to implement actions.
7. The reliability of the interconnected bulk power systems shall be assessed, monitored, and maintained on a wide-area basis.
8. Bulk power systems shall be protected from malicious physical or cyber attacks.

If the Reliability Standard does not provide for a portfolio of performance-, risk-, and competency-based requirements or consistency with NERC's reliability principles, NERC staff should recommend that the Reliability Standard be reformatted in accordance with RBS format.

Attachment 2: Paragraph 81 Criteria

The first question for the SME Review Team asks if one or more of the requirements in the Reliability Standard meet(s) criteria for retirement or modification based on Paragraph 81 concepts.² Use the Paragraph 81 criteria explained below to make this determination. Document the justification for the decisions throughout and provide them in the final assessment in the Five-Year Review worksheet.

For a Reliability Standard requirement to be proposed for retirement or modification based on Paragraph 81 concepts, it must satisfy **both**: (i) Criterion A (the overarching criterion) and (ii) at least one of the Criteria B listed below (identifying criteria). In addition, for each Reliability Standard requirement proposed for retirement or modification, the data and reference points set forth below in Criteria C should be considered for making a more informed decision.

Criterion A (Overarching Criterion)

The Reliability Standard requirement requires responsible entities (“entities”) to conduct an activity or task that does little, if anything, to benefit or protect the reliable operation of the BES.

Section 215(a) (4) of the United States Federal Power Act defines “reliable operation” as: “... operating the elements of the bulk-power system within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or cascading failures of such system will not occur as a result of a sudden disturbance, including a cybersecurity incident, or unanticipated failure of system elements.”

Criteria B (Identifying Criteria)

B1. Administrative

The Reliability Standard requirement requires responsible entities to perform a function that is administrative in nature, does not support reliability and is needlessly burdensome.

This criterion is designed to identify requirements that can be retired or modified with little effect on reliability and whose retirement or modification will result in an increase in the efficiency of the ERO compliance program. Administrative functions may include a task that is related to developing procedures or plans, such as establishing communication contacts. Thus, for certain requirements, Criterion B1 is closely related to Criteria B2, B3 and B4. Strictly administrative functions do not inherently negatively impact reliability directly and, where possible, should be eliminated or modified for purposes of efficiency and to allow the ERO and entities to appropriately allocate resources.

² In most cases, satisfaction of the Paragraph 81 criteria will result in the retirement of a requirement. In some cases, however, there may be a way to modify a requirement so that it no longer satisfies Paragraph 81 criteria. Recognizing that, this document refers to both options.

B2. Data Collection/Data Retention

These are requirements that obligate responsible entities to produce and retain data which document prior events or activities, and should be collected via some other method under NERC's rules and processes.

This criterion is designed to identify requirements that can be retired or modified with little effect on reliability. The collection and/or retention of data do not necessarily have a reliability benefit and yet are often required to demonstrate compliance. Where data collection and/or data retention is unnecessary for reliability purposes, such requirements should be retired or modified in order to increase the efficiency of the ERO compliance program.

B3. Documentation

The Reliability Standard requirement requires responsible entities to develop a document (*e.g.*, plan, policy or procedure) which is not necessary to protect BES reliability.

This criterion is designed to identify requirements that require the development of a document that is unrelated to reliability or has no performance or results-based function. In other words, the document is required, but no execution of a reliability activity or task is associated with or required by the document.

B4. Reporting

The Reliability Standard requirement obligates responsible entities to report to a Regional Entity, NERC or another party or entity. These are requirements that obligate responsible entities to report to a Regional Entity on activities which have no discernible impact on promoting the reliable operation of the BES and if the entity failed to meet this requirement there would be little reliability impact.

B5. Periodic Updates

The Reliability Standard requirement requires responsible entities to periodically update (*e.g.*, annually) documentation, such as a plan, procedure or policy without an operational benefit to reliability.

This criterion is designed to identify requirements that impose an updating requirement that is out of sync with the actual operations of the BES, unnecessary, or duplicative.

B6. Commercial or Business Practice

The Reliability Standard requirement is a commercial or business practice, or implicates commercial rather than reliability issues.

This criterion is designed to identify those requirements that require: (i) implementing a best or outdated business practice or (ii) implicating the exchange of or debate on commercially sensitive information while doing little, if anything, to promote the reliable operation of the BES.

B7. Redundant

The Reliability Standard requirement is redundant with: (i) another FERC-approved Reliability Standard requirement(s); (ii) the ERO compliance and monitoring program; or (iii) a governmental regulation (e.g., Open Access Transmission Tariff, North American Energy Standards Board (“NAESB”), etc.).

This criterion is designed to identify requirements that are redundant with other requirements and are, therefore, unnecessary. Unlike the other criteria listed in Criterion B, in the case of redundancy, the task or activity itself may contribute to a reliable BES, but it is not necessary to have two duplicative requirements on the same or similar task or activity. Such requirements can be retired or modified with little or no effect on reliability and removal will result in an increase in efficiency of the ERO compliance program.

Criteria C (Additional data and reference points)

Use the following data and reference points to assist in the determination of (and justification for) whether to proceed with retirement or modification of a Reliability Standard requirement that satisfies both Criteria A and B:

C1. Was the Reliability Standard requirement part of a FFT filing?

The application of this criterion involves determining whether the requirement was included in a FFT filing.

C2. Is the Reliability Standard requirement being reviewed in an ongoing Standards Development Project?

The application of this criterion involves determining whether the requirement proposed for retirement or modification is part of an active Standards Development Project, with consideration for the status of the project. If the requirement has been approved by Registered Ballot Body and is scheduled to be presented to the NERC Board of Trustees, in most cases it will not need to be addressed in the five-year review. The exception would be a requirement, such as the Critical Information Protection (“CIP”) requirements for Version 3 and 4, that is not due to be retired for an extended period of time. Also, for informational purposes, whether the requirement is included in a future or pending Standards Development Project should be identified and discussed.

C3. What is the VRF of the Reliability Standard requirement?

The application of this criterion involves identifying the VRF of the requirement proposed for retirement or modification, with particular consideration of any requirement that has been assigned as having a Medium or High VRF. Also, the fact that a requirement has a Lower VRF is not dispositive that

it qualifies for retirement or modification. In this regard, Criterion C3 is considered in light of Criterion C5 (Reliability Principles) and C6 (Defense in Depth) to ensure that no reliability gap would be created by the retirement or modification of the Lower VRF requirement. For example, no requirement, including a Lower VRF requirement, should be retired or modified if doing so would harm the effectiveness of a larger scheme of requirements that are purposely designed to protect the reliable operation of the BES.

C4. In which tier of the most recent Actively Monitored List (AML) does the Reliability Standard requirement fall?

The application of this criterion involves identifying whether the requirement proposed for retirement or modification is on the most recent AML, with particular consideration for any requirement in the first tier of the AML.

C5. Is there a possible negative impact on NERC's published and posted reliability principles?

The application of this criterion involves consideration of the eight following reliability principles published on the NERC webpage.

Reliability Principles

NERC Reliability Standards are based on certain reliability principles that define the foundation of reliability for North American bulk power systems. Each reliability standard shall enable or support one or more of the reliability principles, thereby ensuring that each standard serves a purpose in support of reliability of the North American bulk power systems. Each reliability standard shall also be consistent with all of the reliability principles, thereby ensuring that no standard undermines reliability through an unintended consequence.

Principle 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.

Principle 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.

Principle 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.

Principle 4. Plans for emergency operation and system restoration of interconnected bulk power systems shall be developed, coordinated, maintained, and implemented.

Principle 5. Facilities for communication, monitoring, and control shall be provided, used, and maintained for the reliability of interconnected bulk power systems.

Principle 6. Personnel responsible for planning and operating interconnected bulk power systems shall be trained, qualified, and have the responsibility and authority to implement actions.

Principle 7. The reliability of the interconnected bulk power systems shall be assessed, monitored, and maintained on a wide-area basis.

Principle 8. Bulk power systems shall be protected from malicious physical or cyber attacks. (footnote omitted).

C6. Is there any negative impact on the defense in depth protection of the BES?

The application of this criterion considers whether the requirement proposed for retirement or modification is part of a defense in depth protection strategy. In other words, the assessment is to verify whether other requirements rely on the requirement proposed for retirement or modification to protect the BES.

C7. Does the retirement or modification promote results or performance based Reliability Standards?

The application of this criterion considers whether the requirement, if retired or modified, will promote the initiative to implement results- and/or performance-based Reliability Standards.

Five-Year Review Template – EOP-002-3

Submitted to Standards Committee October 17, 2013

Introduction

NERC has an obligation to conduct a five-year review of each Reliability Standard developed through NERC's American National Standards Institute-accredited Reliability Standards development process.¹ The Reliability Standard identified below is due for a five-year review. Your review team should use the background information and the questions below, along with any associated worksheets or reference documents, to guide a comprehensive review that results in a recommendation that the Reliability Standard should be (1) affirmed as is (i.e., no changes needed); (2) revised (which may include revising or retiring one or more requirements); or (3) withdrawn. If the team recommends a revision to the Reliability Standard, it should also submit a draft Standard Authorization Request (SAR) outlining the proposed scope and technical justification for the revision.

A completed five-year review template and any associated documentation should be submitted by email to Laura Hussey, Director of Standards Development at laura.hussey@nerc.net.

Applicable Reliability Standard: EOP-002-3.1 Capacity and Energy Emergencies

Team Members (include name, organization, phone number, and email address):

1. Chair - David McRee, Duke Energy, 704-382-9841, david.mcree@duke-energy.com
2. Vice Chair – Francis Halpin, Bonneville Power, 503-230-7545, fjhalpin@bpa.gov
3. Richard Cobb, Midcontinent ISO, Inc., 651-632-8468, rcobb@misoenergy.org
4. Jen Fiegel, Oncor Electric, 214-743-6825, jfiegel1@oncor.com
5. Hal Haugom, Madison Gas & Electric, 608-252-5608, hhaugom@mge.com
6. Steve Lesiuta, Ontario Power Generation, 416-231-4111, ext. 4034, steve.lesiuta@opg.com
7. Connie Lowe, Dominion Resources Services, Inc., 804-819-2917, connie.lowe@dom.com
8. Brad Young, LG&E/KU, 859-367-5703, brad.young@lge-ku.com

Date Review Completed: September 24, 2013

¹ NERC Standard Processes Manual, posted at http://www.nerc.com/files/Appendix_3A_Standard_Processes_Manual_20110825.pdf, at page 41.

Background Information (to be completed by NERC staff)

1. Are there any outstanding Federal Energy Regulatory Commission directives associated with the Reliability Standard? (If so, NERC staff will attach a list of the directives with citations to associated FERC orders for inclusion in a SAR.)

Yes

No

2. Have stakeholders requested clarity on the Reliability Standard in the form of an Interpretation (outstanding, in progress, or approved), Compliance Application Notice (CAN) (outstanding, in progress, or approved), or an outstanding submission to NERC's Issues Database? (If there are, NERC staff will include a list of the Interpretation(s), CAN(s), or stakeholder-identified issue(s) contained in the NERC Issues Database that apply to the Reliability Standard.)

Yes

No

3. Is the Reliability Standard one of the most violated Reliability Standards? If so, does the root cause of the frequent violation appear to be a lack of clarity in the language?

Yes

No

Please explain:

4. Does the Reliability Standard need to be converted to the results-based standard format as outlined in *Attachment 1: Results-Based Standards*? (Note that the intent of this question is to ensure that, as Reliability Standards are reviewed, the formatting is changed to be consistent with the current format of a Reliability Standard. If the answer is yes, the formatting should be updated when the Reliability Standard is revised.)

Yes

No

Questions for SME Review Team

If NERC staff answered “Yes” to any of the questions above, the Reliability Standard probably requires revision. The questions below are intended to further guide your review. Some of the questions reference documents provided by NERC staff as indicated in the Background questions above.

1. **Paragraph 81:** Does one or more of the requirements in the Reliability Standard meet criteria for retirement or modification based on Paragraph 81 concepts? Use *Attachment 2: Paragraph 81 Criteria* to make this determination.

Yes

No

Please summarize your application of Paragraph 81 Criteria, if any:

- Requirement R1 is redundant with IRO-001 and PER-001-2 and should be retired under Criterion B7 of Paragraph 81.
- Requirement R6 is redundant with BAL-002-1a and should be retired under Criterion B7 of Paragraph 81.
- Requirement R9 was in place to allow for a Transmission Service Provider to change the priority of a service request, informing the Reliability Coordinator so that the service would not be curtailed by a TLR, and since the Tagging Specs did not allow profiles to be changed, this was the only method to accomplish it. Under NAESB WEQ Etag Spec v1811 R3.6.1.3, this has been modified and now the TSP has the ability to change the Transmission priority which, in turn, is reflected in the IDC. This technology change allows for the deletion of Requirement R9 in its entirety. Requirement R9 meets with Criterion A of Paragraph 81 and should be retired. Due to the retirement of R9, LSE applicability should be removed in the standard.

2. **Clarity:** If the Reliability Standard has an Interpretation, CAN, or issue associated with it, or is frequently violated because of ambiguity, it probably needs to be revised for clarity. Beyond these indicators, is there any reason to believe that the Reliability Standard should be modified to address a lack of clarity? Consider:

- a. Is this a Version 0 Reliability Standard?
- b. Does the Reliability Standard have obviously ambiguous language or language that requires performance that is not measurable?
- c. Are the requirements consistent with the purpose of the Reliability Standard?

Yes

No

Please summarize your assessment:

The EOP FYRT recommends that EOP-001-2b and EOP-002-3.1 be revised and merged into a single standard to address redundancy in the stating that a plan should be implemented. Both standards are different enough that those requirements not identified in retirement recommendations under Paragraph 81 should be retained.

Requirement R8 and Attachment 1 have several issues regarding applicability to different functions and should be revised to eliminate discrepancies and for clarity. Attachment 1 needs to be reviewed for consistency with IRO and TOP standards. The EOP FYRT recommends review of the uniqueness as it relates to ERCOT and similarly situated BAs. The EOP FYRT recommends the future EOP SDT address the directive in Paragraph 573 of Order 693.

The EOP FYRT further recommends a language change in Requirement R2, replacing “interconnected system” with “Bulk Electric System.” Requirements R3 and R4 need to be reviewed by the future EOP SDT to further define the word “emergency” (as Capacity Emergency, Emergency, and Energy Emergency are already NERC defined terms). The EOP FYRT recommends the following sentence in Requirement R5 to be struck: “Such unilateral adjustment may overload transmission facilities.”

3. **Definitions:** Do any of the defined terms used within the Reliability Standard need to be refined?

Yes

No

Please explain:

4. **Compliance Elements:** Are the compliance elements associated with the requirements (Measures, Data Retention, VRFs, and VSLs) consistent with the direction of the Reliability Assurance Initiative and FERC and NERC guidelines? If you answered “No,” please identify which elements require revision, and why:

Yes

No

5. **Consistency with Other Reliability Standards:** Does the Reliability Standard need to be revised for formatting and language consistency among requirements within the Reliability Standard or

consistency with other Reliability Standards? If you answered “Yes,” please describe the changes needed to achieve formatting and language consistency:

Yes

No

6. **Changes in Technology, System Conditions, or other Factors:** Does the Reliability Standard need to be revised to account for changes in technology, system conditions, or other factors? If you answered “Yes,” please describe the changes and specifically what the potential impact is to reliability if the Reliability Standard is not revised: Requirement R9 (recommended for retirement under Paragraph 81) the TSP now has the ability to change the Transmission priority, which is in turn reflected in the IDC.

Yes

No

7. **Consideration of Generator Interconnection Facilities:** Is responsibility for generator interconnection Facilities appropriately accounted for in the Reliability Standard?

Yes

No

Guiding Questions:

If the Reliability Standard is applicable to GOs/GOPs, is there any ambiguity about the inclusion of generator interconnection Facilities? (If generation interconnection Facilities could be perceived to be excluded, specific language referencing the Facilities should be introduced in the Reliability Standard.)

If the Reliability Standard is not applicable to GOs/GOPs, is there a reliability-related need for treating generator interconnection Facilities as transmission lines for the purposes of this Reliability Standard? (If so, GOs and GOPs that own or operate relevant generator interconnection Facilities should be explicit in the applicability section of the Reliability Standard.)

Recommendation

The answers to the questions above, along with a preliminary recommendation of the SMEs conducting the review of the Reliability Standard, will be posted for a 45-day informal comment period, and the comments publicly posted. The SMEs will review the comments to evaluate whether to modify their initial recommendation, and will document the final recommendation which will be presented to the Standards Committee.

Preliminary Recommendation (to be completed by the SME team after its review and prior to posting the results of the review for industry comment):

- AFFIRM
- REVISE (and merge with EOP-001-2b)
- RETIRE – Requirements R1, R6 and R9 in its entirety.

Technical Justification *(If the SME team recommends that the Reliability Standard be revised, a draft SAR may be included and the technical justification included in the SAR):*

Preliminary Recommendation posted for industry comment (date): 08/06/2013 – 09/19/2013

Final Recommendation (to be completed by the SME team after it has reviewed industry comments on the preliminary recommendation):

- AFFIRM *(This should only be checked if there are no outstanding directives, interpretations or issues identified by stakeholders.)*
- REVISE (and merge with EOP-001-2b); Requirement R2, replacing “interconnected system” with “Bulk Electric System;” language revision in Requirement R2; Requirements R3 and R4 need to be reviewed by the future EOP SDT to further define the word “emergency” (as Capacity Emergency, Emergency, and Energy Emergency are already NERC defined terms); Requirement R5, strike “Such unilateral adjustment may overload transmission facilities.”
- RETIRE – Requirements R1, R6, and R9 in its entirety. Due to the retirement of R9, LSE applicability should be removed in the standard.

Technical Justification *(If the SME team recommends that the Reliability Standard be revised, a draft SAR may be included and the technical justification included in the SAR):*

Date submitted to NERC Staff:

Attachment 1: Results-Based Standards

The fourth question for NERC staff asks if the Reliability Standard needs to be converted to the results-based standards (RBS) format. The information below will be used by NERC staff in making this determination, and is included here as a reference for the SME team and other stakeholders.

RBS standards employ a defense-in-depth strategy for Reliability Standards development where each requirement has a role in preventing system failures and the roles are complementary and reinforcing. Reliability Standards should be viewed as a portfolio of requirements designed to achieve an overall defense-in-depth strategy and comply with the quality objectives identified in the resource document titled, "[Acceptance Criteria of a Reliability Standard](#)."

A Reliability Standard that adheres to the RBS format should strive to achieve a portfolio of performance-, risk-, and competency-based mandatory reliability requirements that support an effective defense-in-depth strategy. Each requirement should identify a clear and measurable expected outcome, such as: a) a stated level of reliability performance, b) a reduction in a specified reliability risk, or c) a necessary competency.

- a. **Performance-Based**—defines a particular reliability objective or outcome to be achieved. In its simplest form, a results-based requirement has four components: who, under what conditions (if any), shall perform what action, to achieve what particular result or outcome?
- b. **Risk-Based**—preventive requirements to reduce the risks of failure to acceptable tolerance levels. A risk-based reliability requirement should be framed as: who, under what conditions (if any), shall perform what action, to achieve what particular result or outcome that reduces a stated risk to the reliability of the bulk power system?
- c. **Competency-Based**—defines a minimum set of capabilities an entity needs to have to demonstrate it is able to perform its designated reliability functions. A competency-based reliability requirement should be framed as: who, under what conditions (if any), shall have what capability, to achieve what particular result or outcome to perform an action to achieve a result or outcome or to reduce a risk to the reliability of the bulk power system?

Additionally, each RBS-adherent Reliability Standard should enable or support one or more of the eight reliability principles listed below. Each Reliability Standard should also be consistent with all of the reliability principles.

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.

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.
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.
4. Plans for emergency operation and system restoration of interconnected bulk power systems shall be developed, coordinated, maintained, and implemented.
5. Facilities for communication, monitoring, and control shall be provided, used, and maintained for the reliability of interconnected bulk power systems.
6. Personnel responsible for planning and operating interconnected bulk power systems shall be trained, qualified, and have the responsibility and authority to implement actions.
7. The reliability of the interconnected bulk power systems shall be assessed, monitored, and maintained on a wide-area basis.
8. Bulk power systems shall be protected from malicious physical or cyber attacks.

If the Reliability Standard does not provide for a portfolio of performance-, risk-, and competency-based requirements or consistency with NERC's reliability principles, NERC staff should recommend that the Reliability Standard be reformatted in accordance with RBS format.

Attachment 2: Paragraph 81 Criteria

The first question for the SME Review Team asks if one or more of the requirements in the Reliability Standard meet(s) criteria for retirement or modification based on Paragraph 81 concepts.² Use the Paragraph 81 criteria explained below to make this determination. Document the justification for the decisions throughout and provide them in the final assessment in the Five-Year Review worksheet.

For a Reliability Standard requirement to be proposed for retirement or modification based on Paragraph 81 concepts, it must satisfy **both**: (i) Criterion A (the overarching criterion) and (ii) at least one of the Criteria B listed below (identifying criteria). In addition, for each Reliability Standard requirement proposed for retirement or modification, the data and reference points set forth below in Criteria C should be considered for making a more informed decision.

Criterion A (Overarching Criterion)

The Reliability Standard requirement requires responsible entities (“entities”) to conduct an activity or task that does little, if anything, to benefit or protect the reliable operation of the BES.

Section 215(a) (4) of the United States Federal Power Act defines “reliable operation” as: “... operating the elements of the bulk-power system within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or cascading failures of such system will not occur as a result of a sudden disturbance, including a cybersecurity incident, or unanticipated failure of system elements.”

Criteria B (Identifying Criteria)

B1. Administrative

The Reliability Standard requirement requires responsible entities to perform a function that is administrative in nature, does not support reliability and is needlessly burdensome.

This criterion is designed to identify requirements that can be retired or modified with little effect on reliability and whose retirement or modification will result in an increase in the efficiency of the ERO compliance program. Administrative functions may include a task that is related to developing procedures or plans, such as establishing communication contacts. Thus, for certain requirements, Criterion B1 is closely related to Criteria B2, B3 and B4. Strictly administrative functions do not inherently negatively impact reliability directly and, where possible, should be eliminated or modified for purposes of efficiency and to allow the ERO and entities to appropriately allocate resources.

² In most cases, satisfaction of the Paragraph 81 criteria will result in the retirement of a requirement. In some cases, however, there may be a way to modify a requirement so that it no longer satisfies Paragraph 81 criteria. Recognizing that, this document refers to both options.

B2. Data Collection/Data Retention

These are requirements that obligate responsible entities to produce and retain data which document prior events or activities, and should be collected via some other method under NERC's rules and processes.

This criterion is designed to identify requirements that can be retired or modified with little effect on reliability. The collection and/or retention of data do not necessarily have a reliability benefit and yet are often required to demonstrate compliance. Where data collection and/or data retention is unnecessary for reliability purposes, such requirements should be retired or modified in order to increase the efficiency of the ERO compliance program.

B3. Documentation

The Reliability Standard requirement requires responsible entities to develop a document (*e.g.*, plan, policy or procedure) which is not necessary to protect BES reliability.

This criterion is designed to identify requirements that require the development of a document that is unrelated to reliability or has no performance or results-based function. In other words, the document is required, but no execution of a reliability activity or task is associated with or required by the document.

B4. Reporting

The Reliability Standard requirement obligates responsible entities to report to a Regional Entity, NERC or another party or entity. These are requirements that obligate responsible entities to report to a Regional Entity on activities which have no discernible impact on promoting the reliable operation of the BES and if the entity failed to meet this requirement there would be little reliability impact.

B5. Periodic Updates

The Reliability Standard requirement requires responsible entities to periodically update (*e.g.*, annually) documentation, such as a plan, procedure or policy without an operational benefit to reliability.

This criterion is designed to identify requirements that impose an updating requirement that is out of sync with the actual operations of the BES, unnecessary, or duplicative.

B6. Commercial or Business Practice

The Reliability Standard requirement is a commercial or business practice, or implicates commercial rather than reliability issues.

This criterion is designed to identify those requirements that require: (i) implementing a best or outdated business practice or (ii) implicating the exchange of or debate on commercially sensitive information while doing little, if anything, to promote the reliable operation of the BES.

B7. Redundant

The Reliability Standard requirement is redundant with: (i) another FERC-approved Reliability Standard requirement(s); (ii) the ERO compliance and monitoring program; or (iii) a governmental regulation (e.g., Open Access Transmission Tariff, North American Energy Standards Board (“NAESB”), etc.).

This criterion is designed to identify requirements that are redundant with other requirements and are, therefore, unnecessary. Unlike the other criteria listed in Criterion B, in the case of redundancy, the task or activity itself may contribute to a reliable BES, but it is not necessary to have two duplicative requirements on the same or similar task or activity. Such requirements can be retired or modified with little or no effect on reliability and removal will result in an increase in efficiency of the ERO compliance program.

Criteria C (Additional data and reference points)

Use the following data and reference points to assist in the determination of (and justification for) whether to proceed with retirement or modification of a Reliability Standard requirement that satisfies both Criteria A and B:

C1. Was the Reliability Standard requirement part of a FFT filing?

The application of this criterion involves determining whether the requirement was included in a FFT filing.

C2. Is the Reliability Standard requirement being reviewed in an ongoing Standards Development Project?

The application of this criterion involves determining whether the requirement proposed for retirement or modification is part of an active Standards Development Project, with consideration for the status of the project. If the requirement has been approved by Registered Ballot Body and is scheduled to be presented to the NERC Board of Trustees, in most cases it will not need to be addressed in the five-year review. The exception would be a requirement, such as the Critical Information Protection (“CIP”) requirements for Version 3 and 4, that is not due to be retired for an extended period of time. Also, for informational purposes, whether the requirement is included in a future or pending Standards Development Project should be identified and discussed.

C3. What is the VRF of the Reliability Standard requirement?

The application of this criterion involves identifying the VRF of the requirement proposed for retirement or modification, with particular consideration of any requirement that has been assigned as having a Medium or High VRF. Also, the fact that a requirement has a Lower VRF is not dispositive that

it qualifies for retirement or modification. In this regard, Criterion C3 is considered in light of Criterion C5 (Reliability Principles) and C6 (Defense in Depth) to ensure that no reliability gap would be created by the retirement or modification of the Lower VRF requirement. For example, no requirement, including a Lower VRF requirement, should be retired or modified if doing so would harm the effectiveness of a larger scheme of requirements that are purposely designed to protect the reliable operation of the BES.

C4. In which tier of the most recent Actively Monitored List (AML) does the Reliability Standard requirement fall?

The application of this criterion involves identifying whether the requirement proposed for retirement or modification is on the most recent AML, with particular consideration for any requirement in the first tier of the AML.

C5. Is there a possible negative impact on NERC's published and posted reliability principles?

The application of this criterion involves consideration of the eight following reliability principles published on the NERC webpage.

Reliability Principles

NERC Reliability Standards are based on certain reliability principles that define the foundation of reliability for North American bulk power systems. Each reliability standard shall enable or support one or more of the reliability principles, thereby ensuring that each standard serves a purpose in support of reliability of the North American bulk power systems. Each reliability standard shall also be consistent with all of the reliability principles, thereby ensuring that no standard undermines reliability through an unintended consequence.

Principle 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.

Principle 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.

Principle 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.

Principle 4. Plans for emergency operation and system restoration of interconnected bulk power systems shall be developed, coordinated, maintained, and implemented.

Principle 5. Facilities for communication, monitoring, and control shall be provided, used, and maintained for the reliability of interconnected bulk power systems.

Principle 6. Personnel responsible for planning and operating interconnected bulk power systems shall be trained, qualified, and have the responsibility and authority to implement actions.

Principle 7. The reliability of the interconnected bulk power systems shall be assessed, monitored, and maintained on a wide-area basis.

Principle 8. Bulk power systems shall be protected from malicious physical or cyber attacks. (footnote omitted).

C6. Is there any negative impact on the defense in depth protection of the BES?

The application of this criterion considers whether the requirement proposed for retirement or modification is part of a defense in depth protection strategy. In other words, the assessment is to verify whether other requirements rely on the requirement proposed for retirement or modification to protect the BES.

C7. Does the retirement or modification promote results or performance based Reliability Standards?

The application of this criterion considers whether the requirement, if retired or modified, will promote the initiative to implement results- and/or performance-based Reliability Standards.

Five-Year Review Template – EOP-003-2

Submitted to Standards Committee October 17, 2013

Introduction

NERC has an obligation to conduct a five-year review of each Reliability Standard developed through NERC's American National Standards Institute-accredited Reliability Standards development process.¹ The Reliability Standard identified below is due for a five-year review. Your review team should use the background information and the questions below, along with any associated worksheets or reference documents, to guide a comprehensive review that results in a recommendation that the Reliability Standard should be (1) affirmed as is (i.e., no changes needed); (2) revised (which may include revising or retiring one or more requirements); or (3) withdrawn. If the team recommends a revision to the Reliability Standard, it should also submit a draft Standard Authorization Request (SAR) outlining the proposed scope and technical justification for the revision.

A completed five-year review template and any associated documentation should be submitted by email to Laura Hussey, Director of Standards Development at laura.hussey@nerc.net.

Applicable Reliability Standard: EOP-003-2 Load Shedding Plans

Team Members (include name, organization, phone number, and email address):

1. Chair - David McRee, Duke Energy, 704-382-9841, david.mcree@duke-energy.com
2. Vice Chair – Francis Halpin, Bonneville Power, 503-230-7545, fjhalpin@bpa.gov
3. Richard Cobb, Midcontinent ISO, Inc., 651-632-8468, rcobb@misoenergy.org
4. Jen Fiegel, Oncor Electric, 214-743-6825, jfiegel1@oncor.com
5. Hal Haugom, Madison Gas & Electric, 608-252-5608, hhaugom@mge.com
6. Steve Lesiuta, Ontario Power Generation, 416-231-4111, ext. 4034, steve.lesiuta@opg.com
7. Connie Lowe, Dominion Resources Services, Inc., 804-819-2917, connie.lowe@dom.com
8. Brad Young, LG&E/KU, 859-367-5703, brad.young@lge-ku.com

Date Review Completed: September 24, 2013

¹ NERC Standard Processes Manual, posted at http://www.nerc.com/files/Appendix_3A_Standard_Processes_Manual_20110825.pdf, at page 41.

Background Information (to be completed by NERC staff)

1. Are there any outstanding Federal Energy Regulatory Commission directives associated with the Reliability Standard? (If so, NERC staff will attach a list of the directives with citations to associated FERC orders for inclusion in a SAR.)

Yes

No

2. Have stakeholders requested clarity on the Reliability Standard in the form of an Interpretation (outstanding, in progress, or approved), Compliance Application Notice (CAN) (outstanding, in progress, or approved), or an outstanding submission to NERC's Issues Database? (If there are, NERC staff will include a list of the Interpretation(s), CAN(s), or stakeholder-identified issue(s) contained in the NERC Issues Database that apply to the Reliability Standard.)

Yes

No

3. Is the Reliability Standard one of the most violated Reliability Standards? If so, does the root cause of the frequent violation appear to be a lack of clarity in the language?

Yes

No

Please explain:

4. Does the Reliability Standard need to be converted to the results-based standard format as outlined in *Attachment 1: Results-Based Standards*? (Note that the intent of this question is to ensure that, as Reliability Standards are reviewed, the formatting is changed to be consistent with the current format of a Reliability Standard. If the answer is yes, the formatting should be updated when the Reliability Standard is revised.)

Yes

No

Questions for SME Review Team

If NERC staff answered “Yes” to any of the questions above, the Reliability Standard probably requires revision. The questions below are intended to further guide your review. Some of the questions reference documents provided by NERC staff as indicated in the Background questions above.

1. **Paragraph 81:** Does one or more of the requirements in the Reliability Standard meet criteria for retirement or modification based on Paragraph 81 concepts? Use *Attachment 2: Paragraph 81 Criteria* to make this determination.

Yes

No

Please summarize your application of Paragraph 81 Criteria, if any:

- Requirements R5 is a refinement to EOP-003-2 Requirement R1 and is duplicative in nature to that requirement. Requirement R5 speaks to shedding loads in steps; that same process will be done in Requirement R1. Requirement R5 should be retired under Criterion B7 of Paragraph 81.
- Requirements R6 is a refinement to EOP-003-2 Requirement R1 and is duplicative in nature to that requirement. Requirement R6 speaks of two events that must be valid to tell the BA or TOP to shed more load, but overall the action of shedding load to meet insufficient generation is the same as stated in Requirement R1. Requirement R6 should be retired under Criterion B7 of Paragraph 81.
- EOP-003-2– Recommend that Requirements R2, R4 and R7 be moved to PRC-010-0 or otherwise addressed during Project 2008-02 – Undervoltage Load Shedding.

2. **Clarity:** If the Reliability Standard has an Interpretation, CAN, or issue associated with it, or is frequently violated because of ambiguity, it probably needs to be revised for clarity. Beyond these indicators, is there any reason to believe that the Reliability Standard should be modified to address a lack of clarity? Consider:

- a. Is this a Version 0 Reliability Standard?
- b. Does the Reliability Standard have obviously ambiguous language or language that requires performance that is not measurable?
- c. Are the requirements consistent with the purpose of the Reliability Standard?

Yes

No

Please summarize your assessment:

The EOP FYRT team believes that Requirements R2, R4 and R7 should be coordinated with the revision of PRC-010 (Project 2008-02 Undervoltage Load Shedding) for inclusion in that standard. This is consistent with the review that was done for automatic underfrequency requirements and should also be performed for automatic undervoltage requirements.

Based on the recommendations received during the comment period, EOP FYRT further recommends R1 and R8 be considered to be combined. The EOP FYRT also received comments that EOP-003-2 should be combined with EOP-001-2.1b and EOP-002-3.1, and the EOP FYRT recommends this be evaluated in the SAR. In addition, the EOP FYRT recommends that the future EOP SDT evaluate the separation of the functional entity capabilities of the BA and the TOP responsibilities.

3. **Definitions:** Do any of the defined terms used within the Reliability Standard need to be refined?

Yes

No

Please explain:

4. **Compliance Elements:** Are the compliance elements associated with the requirements (Measures, Data Retention, VRFs, and VSLs) consistent with the direction of the Reliability Assurance Initiative and FERC and NERC guidelines? If you answered “No,” please identify which elements require revision, and why:

The Measures and Data retention should be reviewed and updated

Yes

No

5. **Consistency with Other Reliability Standards:** Does the Reliability Standard need to be revised for formatting and language consistency among requirements within the Reliability Standard or consistency with other Reliability Standards? If you answered “Yes,” please describe the changes needed to achieve formatting and language consistency:

Yes

No

6. **Changes in Technology, System Conditions, or other Factors:** Does the Reliability Standard need to be revised to account for changes in technology, system conditions, or other factors? If you answered “Yes,” please describe the changes and specifically what the potential impact is to reliability if the Reliability Standard is not revised:

Yes

No

7. **Consideration of Generator Interconnection Facilities:** Is responsibility for generator interconnection Facilities appropriately accounted for in the Reliability Standard?

Yes

No

Guiding Questions:

If the Reliability Standard is applicable to GOs/GOPs, is there any ambiguity about the inclusion of generator interconnection Facilities? (If generation interconnection Facilities could be perceived to be excluded, specific language referencing the Facilities should be introduced in the Reliability Standard.)

If the Reliability Standard is not applicable to GOs/GOPs, is there a reliability-related need for treating generator interconnection Facilities as transmission lines for the purposes of this Reliability Standard? (If so, GOs and GOPs that own or operate relevant generator interconnection Facilities should be explicit in the applicability section of the Reliability Standard.)

Recommendation

The answers to the questions above, along with a preliminary recommendation of the SMEs conducting the review of the Reliability Standard, will be posted for a 45-day informal comment period, and the comments publicly posted. The SMEs will review the comments to evaluate whether to modify their initial recommendation, and will document the final recommendation which will be presented to the Standards Committee.

Preliminary Recommendation (to be completed by the SME team after its review and prior to posting the results of the review for industry comment):

- AFFIRM
- REVISE – Retire Requirements R5, R6, R2, R4 and R7 and address directives in Paragraphs 595 and 603 of Order 693
- RETIRE

Technical Justification (*If the SME team recommends that the Reliability Standard be revised, a draft SAR may be included and the technical justification included in the SAR*): See responses to questions 1, 2, and 4 above.

Preliminary Recommendation posted for industry comment (date): 08/06/2013 – 09/19/2013

Final Recommendation (to be completed by the SME team after it has reviewed industry comments on the preliminary recommendation):

- AFFIRM (*This should only be checked if there are no outstanding directives, interpretations or issues identified by stakeholders.*)
- REVISE - Retire Requirements R5, R6, R2, R4 and R7 and address directives in Paragraphs 595 and 603 or Order 693; recommend for consideration Requirements R1 and R8 be combined; consider combining EOP-003-2 with EOP-001-2.1b and EOP-002-3.1; evaluate the separation of the functional entity capabilities of the BA and TOP responsibilities.
- RETIRE

Technical Justification (*If the SME team recommends that the Reliability Standard be revised, a draft SAR may be included and the technical justification included in the SAR*):

Date submitted to NERC Staff:

Attachment 1: Results-Based Standards

The fourth question for NERC staff asks if the Reliability Standard needs to be converted to the results-based standards (RBS) format. The information below will be used by NERC staff in making this determination, and is included here as a reference for the SME team and other stakeholders.

RBS standards employ a defense-in-depth strategy for Reliability Standards development where each requirement has a role in preventing system failures and the roles are complementary and reinforcing. Reliability Standards should be viewed as a portfolio of requirements designed to achieve an overall defense-in-depth strategy and comply with the quality objectives identified in the resource document titled, "[Acceptance Criteria of a Reliability Standard](#)."

A Reliability Standard that adheres to the RBS format should strive to achieve a portfolio of performance-, risk-, and competency-based mandatory reliability requirements that support an effective defense-in-depth strategy. Each requirement should identify a clear and measurable expected outcome, such as: a) a stated level of reliability performance, b) a reduction in a specified reliability risk, or c) a necessary competency.

- a. **Performance-Based**—defines a particular reliability objective or outcome to be achieved. In its simplest form, a results-based requirement has four components: who, under what conditions (if any), shall perform what action, to achieve what particular result or outcome?
- b. **Risk-Based**—preventive requirements to reduce the risks of failure to acceptable tolerance levels. A risk-based reliability requirement should be framed as: who, under what conditions (if any), shall perform what action, to achieve what particular result or outcome that reduces a stated risk to the reliability of the bulk power system?
- c. **Competency-Based**—defines a minimum set of capabilities an entity needs to have to demonstrate it is able to perform its designated reliability functions. A competency-based reliability requirement should be framed as: who, under what conditions (if any), shall have what capability, to achieve what particular result or outcome to perform an action to achieve a result or outcome or to reduce a risk to the reliability of the bulk power system?

Additionally, each RBS-adherent Reliability Standard should enable or support one or more of the eight reliability principles listed below. Each Reliability Standard should also be consistent with all of the reliability principles.

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.

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.
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.
4. Plans for emergency operation and system restoration of interconnected bulk power systems shall be developed, coordinated, maintained, and implemented.
5. Facilities for communication, monitoring, and control shall be provided, used, and maintained for the reliability of interconnected bulk power systems.
6. Personnel responsible for planning and operating interconnected bulk power systems shall be trained, qualified, and have the responsibility and authority to implement actions.
7. The reliability of the interconnected bulk power systems shall be assessed, monitored, and maintained on a wide-area basis.
8. Bulk power systems shall be protected from malicious physical or cyber attacks.

If the Reliability Standard does not provide for a portfolio of performance-, risk-, and competency-based requirements or consistency with NERC's reliability principles, NERC staff should recommend that the Reliability Standard be reformatted in accordance with RBS format.

Attachment 2: Paragraph 81 Criteria

The first question for the SME Review Team asks if one or more of the requirements in the Reliability Standard meet(s) criteria for retirement or modification based on Paragraph 81 concepts.² Use the Paragraph 81 criteria explained below to make this determination. Document the justification for the decisions throughout and provide them in the final assessment in the Five-Year Review worksheet.

For a Reliability Standard requirement to be proposed for retirement or modification based on Paragraph 81 concepts, it must satisfy **both**: (i) Criterion A (the overarching criterion) and (ii) at least one of the Criteria B listed below (identifying criteria). In addition, for each Reliability Standard requirement proposed for retirement or modification, the data and reference points set forth below in Criteria C should be considered for making a more informed decision.

Criterion A (Overarching Criterion)

The Reliability Standard requirement requires responsible entities (“entities”) to conduct an activity or task that does little, if anything, to benefit or protect the reliable operation of the BES.

Section 215(a) (4) of the United States Federal Power Act defines “reliable operation” as: “... operating the elements of the bulk-power system within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or cascading failures of such system will not occur as a result of a sudden disturbance, including a cybersecurity incident, or unanticipated failure of system elements.”

Criteria B (Identifying Criteria)

B1. Administrative

The Reliability Standard requirement requires responsible entities to perform a function that is administrative in nature, does not support reliability and is needlessly burdensome.

This criterion is designed to identify requirements that can be retired or modified with little effect on reliability and whose retirement or modification will result in an increase in the efficiency of the ERO compliance program. Administrative functions may include a task that is related to developing procedures or plans, such as establishing communication contacts. Thus, for certain requirements, Criterion B1 is closely related to Criteria B2, B3 and B4. Strictly administrative functions do not inherently negatively impact reliability directly and, where possible, should be eliminated or modified for purposes of efficiency and to allow the ERO and entities to appropriately allocate resources.

² In most cases, satisfaction of the Paragraph 81 criteria will result in the retirement of a requirement. In some cases, however, there may be a way to modify a requirement so that it no longer satisfies Paragraph 81 criteria. Recognizing that, this document refers to both options.

B2. Data Collection/Data Retention

These are requirements that obligate responsible entities to produce and retain data which document prior events or activities, and should be collected via some other method under NERC's rules and processes.

This criterion is designed to identify requirements that can be retired or modified with little effect on reliability. The collection and/or retention of data do not necessarily have a reliability benefit and yet are often required to demonstrate compliance. Where data collection and/or data retention is unnecessary for reliability purposes, such requirements should be retired or modified in order to increase the efficiency of the ERO compliance program.

B3. Documentation

The Reliability Standard requirement requires responsible entities to develop a document (*e.g.*, plan, policy or procedure) which is not necessary to protect BES reliability.

This criterion is designed to identify requirements that require the development of a document that is unrelated to reliability or has no performance or results-based function. In other words, the document is required, but no execution of a reliability activity or task is associated with or required by the document.

B4. Reporting

The Reliability Standard requirement obligates responsible entities to report to a Regional Entity, NERC or another party or entity. These are requirements that obligate responsible entities to report to a Regional Entity on activities which have no discernible impact on promoting the reliable operation of the BES and if the entity failed to meet this requirement there would be little reliability impact.

B5. Periodic Updates

The Reliability Standard requirement requires responsible entities to periodically update (*e.g.*, annually) documentation, such as a plan, procedure or policy without an operational benefit to reliability.

This criterion is designed to identify requirements that impose an updating requirement that is out of sync with the actual operations of the BES, unnecessary, or duplicative.

B6. Commercial or Business Practice

The Reliability Standard requirement is a commercial or business practice, or implicates commercial rather than reliability issues.

This criterion is designed to identify those requirements that require: (i) implementing a best or outdated business practice or (ii) implicating the exchange of or debate on commercially sensitive information while doing little, if anything, to promote the reliable operation of the BES.

B7. Redundant

The Reliability Standard requirement is redundant with: (i) another FERC-approved Reliability Standard requirement(s); (ii) the ERO compliance and monitoring program; or (iii) a governmental regulation (e.g., Open Access Transmission Tariff, North American Energy Standards Board (“NAESB”), etc.).

This criterion is designed to identify requirements that are redundant with other requirements and are, therefore, unnecessary. Unlike the other criteria listed in Criterion B, in the case of redundancy, the task or activity itself may contribute to a reliable BES, but it is not necessary to have two duplicative requirements on the same or similar task or activity. Such requirements can be retired or modified with little or no effect on reliability and removal will result in an increase in efficiency of the ERO compliance program.

Criteria C (Additional data and reference points)

Use the following data and reference points to assist in the determination of (and justification for) whether to proceed with retirement or modification of a Reliability Standard requirement that satisfies both Criteria A and B:

C1. Was the Reliability Standard requirement part of a FFT filing?

The application of this criterion involves determining whether the requirement was included in a FFT filing.

C2. Is the Reliability Standard requirement being reviewed in an ongoing Standards Development Project?

The application of this criterion involves determining whether the requirement proposed for retirement or modification is part of an active Standards Development Project, with consideration for the status of the project. If the requirement has been approved by Registered Ballot Body and is scheduled to be presented to the NERC Board of Trustees, in most cases it will not need to be addressed in the five-year review. The exception would be a requirement, such as the Critical Information Protection (“CIP”) requirements for Version 3 and 4, that is not due to be retired for an extended period of time. Also, for informational purposes, whether the requirement is included in a future or pending Standards Development Project should be identified and discussed.

C3. What is the VRF of the Reliability Standard requirement?

The application of this criterion involves identifying the VRF of the requirement proposed for retirement or modification, with particular consideration of any requirement that has been assigned as having a Medium or High VRF. Also, the fact that a requirement has a Lower VRF is not dispositive that

it qualifies for retirement or modification. In this regard, Criterion C3 is considered in light of Criterion C5 (Reliability Principles) and C6 (Defense in Depth) to ensure that no reliability gap would be created by the retirement or modification of the Lower VRF requirement. For example, no requirement, including a Lower VRF requirement, should be retired or modified if doing so would harm the effectiveness of a larger scheme of requirements that are purposely designed to protect the reliable operation of the BES.

C4. In which tier of the most recent Actively Monitored List (AML) does the Reliability Standard requirement fall?

The application of this criterion involves identifying whether the requirement proposed for retirement or modification is on the most recent AML, with particular consideration for any requirement in the first tier of the AML.

C5. Is there a possible negative impact on NERC's published and posted reliability principles?

The application of this criterion involves consideration of the eight following reliability principles published on the NERC webpage.

Reliability Principles

NERC Reliability Standards are based on certain reliability principles that define the foundation of reliability for North American bulk power systems. Each reliability standard shall enable or support one or more of the reliability principles, thereby ensuring that each standard serves a purpose in support of reliability of the North American bulk power systems. Each reliability standard shall also be consistent with all of the reliability principles, thereby ensuring that no standard undermines reliability through an unintended consequence.

Principle 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.

Principle 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.

Principle 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.

Principle 4. Plans for emergency operation and system restoration of interconnected bulk power systems shall be developed, coordinated, maintained, and implemented.

Principle 5. Facilities for communication, monitoring, and control shall be provided, used, and maintained for the reliability of interconnected bulk power systems.

Principle 6. Personnel responsible for planning and operating interconnected bulk power systems shall be trained, qualified, and have the responsibility and authority to implement actions.

Principle 7. The reliability of the interconnected bulk power systems shall be assessed, monitored, and maintained on a wide-area basis.

Principle 8. Bulk power systems shall be protected from malicious physical or cyber attacks. (footnote omitted).

C6. Is there any negative impact on the defense in depth protection of the BES?

The application of this criterion considers whether the requirement proposed for retirement or modification is part of a defense in depth protection strategy. In other words, the assessment is to verify whether other requirements rely on the requirement proposed for retirement or modification to protect the BES.

C7. Does the retirement or modification promote results or performance based Reliability Standards?

The application of this criterion considers whether the requirement, if retired or modified, will promote the initiative to implement results- and/or performance-based Reliability Standards.

A. Introduction

- 1. Title:** **Emergency Operations Planning**
- 2. Number:** EOP-001-2.1b
- 3. Purpose:** Each Transmission Operator and Balancing Authority needs to develop, maintain, and implement a set of plans to mitigate operating emergencies. These plans need to be coordinated with other Transmission Operators and Balancing Authorities, and the Reliability Coordinator.
- 4. Applicability**
 - 4.1.** Balancing Authorities.
 - 4.2.** Transmission Operators.
- 5. Proposed Effective Date:** Twenty-four months after the first day of the first calendar quarter following applicable regulatory approval. In those jurisdictions where no regulatory approval is required, all requirements go into effect twenty-four months after Board of Trustees adoption.

B. Requirements

- 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.
- R2.** Each Transmission Operator and Balancing Authority shall:
 - R2.1.** Develop, maintain, and implement a set of plans to mitigate operating emergencies for insufficient generating capacity.
 - R2.2.** Develop, maintain, and implement a set of plans to mitigate operating emergencies on the transmission system.
 - R2.3.** Develop, maintain, and implement a set of plans for load shedding.
- R3.** Each Transmission Operator and Balancing Authority shall have emergency plans that will enable it to mitigate operating emergencies. At a minimum, Transmission Operator and Balancing Authority emergency plans shall include:
 - R3.1.** Communications protocols to be used during emergencies.
 - R3.2.** A list of controlling actions to resolve the emergency. Load reduction, in sufficient quantity to resolve the emergency within NERC-established timelines, shall be one of the controlling actions.
 - R3.3.** The tasks to be coordinated with and among adjacent Transmission Operators and Balancing Authorities.
 - R3.4.** Staffing levels for the emergency.
- R4.** Each Transmission Operator and Balancing Authority shall include the applicable elements in Attachment 1-EOP-001 when developing an emergency plan.
- R5.** The Transmission Operator and Balancing Authority shall annually review and update each emergency plan. The Transmission Operator and Balancing Authority shall provide a copy of its updated emergency plans to its Reliability Coordinator and to neighboring Transmission Operators and Balancing Authorities.

R6. The Transmission Operator and Balancing Authority shall coordinate its emergency plans with other Transmission Operators and Balancing Authorities as appropriate. This coordination includes the following steps, as applicable:

R6.1. The Transmission Operator and Balancing Authority shall establish and maintain reliable communications between interconnected systems.

R6.2. The Transmission Operator and Balancing Authority shall arrange new interchange agreements to provide for emergency capacity or energy transfers if existing agreements cannot be used.

R6.3. The Transmission Operator and Balancing Authority shall coordinate transmission and generator maintenance schedules to maximize capacity or conserve the fuel in short supply. (This includes water for hydro generators.)

R6.4. The Transmission Operator and Balancing Authority shall arrange deliveries of electrical energy or fuel from remote systems through normal operating channels.

C. Measures

M1. The Transmission Operator and Balancing Authority shall have its emergency plans available for review by the Regional Reliability Organization at all times.

M2. The Transmission Operator and Balancing Authority shall have its two most recent annual self-assessments available for review by the Regional Reliability Organization at all times.

D. Compliance

1. Compliance Monitoring Process

1.1. Compliance Monitoring Responsibility

Regional Reliability Organization.

1.2. Compliance Monitoring Period and Reset Time Frame

The Regional Reliability Organization shall review and evaluate emergency plans every three years to ensure that the plans consider the applicable elements of Attachment 1-EOP-001.

The Regional Reliability Organization may elect to request self-certification of the Transmission Operator and Balancing Authority in years that the full review is not done.

Reset: one calendar year.

1.3. Data Retention

Current plan available at all times.

1.4. Additional Compliance Information

Not specified.

2. Violation Severity Levels:

Requirement	Lower	Moderate	High	Severe
R1	The Balancing Authority failed to demonstrate the existence of the necessary operating agreements for less than 25% of the adjacent BAs. Or less than 25% of those agreements do not contain provisions for emergency assistance.	The Balancing Authority failed to demonstrate the existence of the necessary operating agreements for 25% to 50% of the adjacent BAs. Or 25 to 50% of those agreements do not contain provisions for emergency assistance.	The Balancing Authority failed to demonstrate the existence of the necessary operating agreements for 50% to 75% of the adjacent BAs. Or 50% to 75% of those agreements do not contain provisions for emergency assistance.	The Balancing Authority failed to demonstrate the existence of the necessary operating agreements for 75% or more of the adjacent BAs. Or more than 75% of those agreements do not contain provisions for emergency assistance.
R2	The Transmission Operator or Balancing Authority failed to comply with one (1) of the sub-components.	The Transmission Operator or Balancing Authority failed to comply with two (2) of the sub-components.	N/A	The Transmission Operator or Balancing Authority has failed to comply with three (3) of the sub-components.
R2.1	The Transmission Operator or Balancing Authority's emergency plans to mitigate insufficient generating capacity are missing minor details or minor program/procedural elements.	The Transmission Operator or Balancing Authority's has demonstrated the existence of emergency plans to mitigate insufficient generating capacity emergency plans but the plans are not maintained.	The Transmission Operator or Balancing Authority's emergency plans to mitigate insufficient generating capacity emergency plans are neither maintained nor implemented.	The Transmission Operator or Balancing Authority has failed to develop emergency mitigation plans for insufficient generating capacity.
R2.2	The Transmission Operator or Balancing Authority's plans to mitigate transmission system emergencies are missing minor details or minor program/procedural elements.	The Transmission Operator or Balancing Authority's has demonstrated the existence of transmission system emergency plans but are not maintained.	The Transmission Operator or Balancing Authority's transmission system emergency plans are neither maintained nor implemented.	The Transmission Operator or Balancing Authority has failed to develop, maintain, and implement operating emergency mitigation plans for emergencies on the transmission system.

Requirement	Lower	Moderate	High	Severe
R2.3	The Transmission Operator or Balancing Authority's load shedding plans are missing minor details or minor program/procedural elements.	The Transmission Operator or Balancing Authority's has demonstrated the existence of load shedding plans but are not maintained.	The Transmission Operator or Balancing Authority's load shedding plans are partially compliant with the requirement but are neither maintained nor implemented.	The Transmission Operator or Balancing Authority has failed to develop, maintain, and implement load shedding plans.
R3	The Transmission Operator or Balancing Authority failed to comply with one (1) of the sub-components.	The Transmission Operator or Balancing Authority failed to comply with two (2) of the sub-components.	The Transmission Operator or Balancing Authority has failed to comply with three (3) of the sub-components.	The Transmission Operator or Balancing Authority has failed to comply with all four (4) of the sub-components.
R3.1	The Transmission Operator or Balancing Authority's communication protocols included in the emergency plan are missing minor program/procedural elements.	N/A	N/A	The Transmission Operator or Balancing Authority has failed to include communication protocols in its emergency plans to mitigate operating emergencies.
R3.2	The Transmission Operator or Balancing Authority's list of controlling actions has resulted in meeting the intent of the requirement but is missing minor program/procedural elements.	N/A	The Transmission Operator or Balancing Authority provided a list of controlling actions, however the actions fail to resolve the emergency within NERC-established timelines.	The Transmission Operator or Balancing Authority has failed to provide a list of controlling actions to resolve the emergency.

Requirement	Lower	Moderate	High	Severe
R3.3	The Transmission Operator or Balancing Authority has demonstrated coordination with Transmission Operators and Balancing Authorities but is missing minor program/procedural elements.	N/A	N/A	The Transmission Operator or Balancing Authority has failed to demonstrate the tasks to be coordinated with adjacent Transmission Operator and Balancing Authorities as directed by the requirement.
R3.4	The Transmission Operator or Balancing Authority's emergency plan does not include staffing levels for the emergency	N/A	N/A	N/A
R4	The Transmission Operator and Balancing Authority's emergency plan has complied with 90% or more of the number of sub-components.	The Transmission Operator and Balancing Authority's emergency plan has complied with 70% to 90% of the number of sub-components.	The Transmission Operator and Balancing Authority's emergency plan has complied with between 50% to 70% of the number of sub-components.	The Transmission Operator and Balancing Authority's emergency plan has complied with 50% or less of the number of sub-components
R5	The Transmission Operator and Balancing Authority is missing minor program/procedural elements.	The Transmission Operator and Balancing Authority has failed to annually review one of it's emergency plans	The Transmission Operator and Balancing Authority has failed to annually review two of its emergency plans or communicate with one of it's neighboring Balancing Authorities.	The Transmission Operator and Balancing Authority has failed to annually review and/or communicate any emergency plans with its Reliability Coordinator, neighboring Transmission Operators or Balancing Authorities.
R6	The Transmission Operator and/or the Balancing Authority failed to comply with one (1) of the sub-components.	The Transmission Operator and/or the Balancing Authority failed to comply with two (2) of the sub-components.	The Transmission Operator and/or the Balancing Authority has failed to comply with three (3) of the sub-components.	The Transmission Operator and/or the Balancing Authority has failed to comply with four (4) or more of the sub-components.

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Requirement	Lower	Moderate	High	Severe
R6.1	The Transmission Operator or Balancing Authority has failed to establish and maintain reliable communication between interconnected systems.	N/A	N/A	N/A
R6.2	The Transmission Operator or Balancing Authority has failed to arrange new interchange agreements to provide for emergency capacity or energy transfers with required entities when existing agreements could not be used.	N/A	N/A	N/A
R6.3	The Transmission Operator or Balancing Authority has failed to coordinate transmission and generator maintenance schedules to maximize capacity or conserve fuel in short supply.	N/A	N/A	N/A
R6.4	The Transmission Operator or Balancing Authority has failed to arrange for deliveries of electrical energy or fuel from remote systems through normal operating channels.	N/A	N/A	N/A

E. Regional Differences

None identified.

Version History

Version	Date	Action	Change Tracking
0	February 8, 2005	Adopted by the Board of Trustees	New
0	April 1, 2005	Effective Date	New
0	August 8, 2005	Removed “Proposed” from Effective Date	Errata
1	October 17, 2008	Deleted R2 Replaced Levels of Non-compliance with the February 28, 2008 BOT approved Violation Severity Levels Corrected typographical errors in BOT approved version of VSLs	Revised IROL Project
2	August 5, 2009	Removed R2.4 as redundant with EOP-005-2 Requirement R1 for the Transmission Operator; the Balancing Authority does not need a restoration plan.	Revised Project 2006-03
2	August 5, 2009	Adopted by NERC Board of Trustees: August 5, 2009	Revised
2	March 17, 2011	FERC Order issued approving EOP-001-2 (Clarification issued on July 13, 2011)	Revised
2b	November 4, 2010	Adopted by NERC Board of Trustees	Project 2008-09 - Interpretation of Requirement R1
2b	November 4, 2010	Adopted by NERC Board of Trustees	Project 2009-28 - Interpretation of Requirement R2.2
2b	December 15, 2011	FERC Order issued approving Interpretation of R1 and R2.2 (Order effective December 15, 2011)	Project 2008-09 - Interpretation of Requirement R1 and Project 2009-28 - Interpretation of Requirement R2.2
2.1b	March 8, 2012	Errata adopted by Standards Committee; (changed title and references to Attachment 1 to omit inclusion of version numbers and corrected references in Appendix 1 Question 4 from “EOP-001-0” to “EOP-001-2”)	Errata

Standard EOP-001-2.1b — Emergency Operations Planning

2.1b	September 13, 2012	FERC approved	Errata
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Attachment 1-EOP-001

Elements for Consideration in Development of Emergency Plans

1. Fuel supply and inventory — An adequate fuel supply and inventory plan that recognizes reasonable delays or problems in the delivery or production of fuel.
2. Fuel switching — Fuel switching plans for units for which fuel supply shortages may occur, e.g., gas and light oil.
3. Environmental constraints — Plans to seek removal of environmental constraints for generating units and plants.
4. System energy use — The reduction of the system's own energy use to a minimum.
5. Public appeals — Appeals to the public through all media for voluntary load reductions and energy conservation including educational messages on how to accomplish such load reduction and conservation.
6. Load management — Implementation of load management and voltage reductions, if appropriate.
7. Optimize fuel supply — The operation of all generating sources to optimize the availability.
8. Appeals to customers to use alternate fuels — In a fuel emergency, appeals to large industrial and commercial customers to reduce non-essential energy use and maximize the use of customer-owned generation that rely on fuels other than the one in short supply.
9. Interruptible and curtailable loads — Use of interruptible and curtailable customer load to reduce capacity requirements or to conserve the fuel in short supply.
10. Maximizing generator output and availability — The operation of all generating sources to maximize output and availability. This should include plans to winterize units and plants during extreme cold weather.
11. Notifying IPPs — Notification of cogeneration and independent power producers to maximize output and availability.
12. Requests of government — Requests to appropriate government agencies to implement programs to achieve necessary energy reductions.
13. Load curtailment — A mandatory load curtailment plan to use as a last resort. This plan should address the needs of critical loads essential to the health, safety, and welfare of the community. Address firm load curtailment.
14. Notification of government agencies — Notification of appropriate government agencies as the various steps of the emergency plan are implemented.
15. Notifications to operating entities — Notifications to other operating entities as steps in emergency plan are implemented.

Appendix 1

Requirement Number and Text of Requirement
<p>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.</p>
Questions:
<ol style="list-style-type: none"> 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, have to establish additional operating agreements to achieve compliance with Reliability Standard EOP-001-2, Requirement 1?
Responses:
<ol style="list-style-type: none"> 1. In the context of this standard, emergency assistance is emergency energy. Emergency energy would normally be arranged for during the current operating day. The agreement should describe the conditions under which the emergency energy will be delivered to the responsible Balancing Authority. 2. The intent is that all Balancing Authorities, interconnected by AC ties or DC (asynchronous) ties within the same Interconnection, have emergency energy assistance agreements with at least one Adjacent Balancing Authority and have sufficient emergency energy assistance agreements to mitigate reasonably anticipated energy emergencies. However, the standard does not require emergency energy assistance agreements with all Adjacent Balancing Authorities, nor does it preclude having an emergency assistance agreement across Interconnections. 3. A remote Balancing Authority is a Balancing Authority other than an Adjacent Balancing Authority. A Balancing Authority is not required to have arrangements in place to obtain emergency energy assistance with any remote Balancing Authorities. A Balancing Authority’s agreement(s) with Adjacent Balancing Authorities does (do) not preclude the Adjacent Balancing Authority from purchasing emergency energy from remote Balancing Authorities. 4. A Reserve Sharing Group agreement that contains provisions for emergency assistance may be used to meet Requirement R1 of EOP-001-2.

Appendix 2

Requirement Number and Text of Requirement
R2.2. Develop, maintain, and implement a set of plans to mitigate operating emergencies on the transmission system.
Questions:
Does the BA need to develop a plan to maintain a load-interchange-generation balance during operating emergencies and follow the directives of the TOP?
Questions:
The answer to both parts of the question is yes. The Balancing Authority is required by the standard to develop, maintain, and implement a plan. The plan must consider the relationships and coordination with the Transmission Operator for actions directly taken by the Balancing Authority. The Balancing Authority must take actions either as directed by the Transmission Operator or the Reliability Coordinator (reference TOP-001-1, Requirement R3), or as previously agreed to with the Transmission Operator or the Reliability Coordinator to mitigate transmission emergencies. As stated in Requirement R4, the emergency plan shall include the applicable elements in “Attachment 1 –EOP-001.”

*** FOR INFORMATIONAL PURPOSES ONLY ***

Enforcement Dates: Standard EOP-001-2.1b — Emergency Operations Planning

United States

Standard	Requirement	Enforcement Date	Inactive Date
EOP-001-2.1b	All	07/01/2013	

Standard EOP-002-3.1 — Capacity and Energy Emergencies

A. Introduction

1. **Title:** Capacity and Energy Emergencies
2. **Number:** EOP-002-3.1
3. **Purpose:** To ensure Reliability Coordinators and Balancing Authorities are prepared for capacity and energy emergencies.
4. **Applicability**
 - 4.1. Balancing Authorities.
 - 4.2. Reliability Coordinators.
 - 4.3. Load-Serving Entities.
5. **(Proposed) Effective Date:** First day of the first calendar quarter six months following applicable regulatory approval; or, in those jurisdictions where no regulatory approval is required, the first day of the first calendar quarter six months following Board of Trustees adoption.

B. Requirements

- R1. Each Balancing Authority and Reliability Coordinator shall have the responsibility and clear decision-making authority to take whatever actions are needed to ensure the reliability of its respective area and shall exercise specific authority to alleviate capacity and energy emergencies.
- R2. Each Balancing Authority shall, when required and as appropriate, take one or more actions as described in its capacity and energy emergency plan to reduce risks to the interconnected system.
- R3. A Balancing Authority that is experiencing an operating capacity or energy emergency shall communicate its current and future system conditions to its Reliability Coordinator and neighboring Balancing Authorities.
- R4. A Balancing Authority anticipating an operating capacity or energy emergency shall perform all actions necessary including bringing on all available generation, postponing equipment maintenance, scheduling interchange purchases in advance, and being prepared to reduce firm load.
- R5. A deficient Balancing Authority shall only use the assistance provided by the Interconnection's frequency bias for the time needed to implement corrective actions. The Balancing Authority shall not unilaterally adjust generation in an attempt to return Interconnection frequency to normal beyond that supplied through frequency bias action and Interchange Schedule changes. Such unilateral adjustment may overload transmission facilities.
- R6. If the Balancing Authority cannot comply with the Control Performance and Disturbance Control Standards, then it shall immediately implement remedies to do so. These remedies include, but are not limited to:
 - R6.1. Loading all available generating capacity.
 - R6.2. Deploying all available operating reserve.
 - R6.3. Interrupting interruptible load and exports.
 - R6.4. Requesting emergency assistance from other Balancing Authorities.
 - R6.5. Declaring an Energy Emergency through its Reliability Coordinator; and

Standard EOP-002-3.1 — Capacity and Energy Emergencies

- R6.6.** Reducing load, through procedures such as public appeals, voltage reductions, curtailing interruptible loads and firm loads.
- 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:
 - R7.1.** Manually shed firm load without delay to return its ACE to zero; and
 - R7.2.** Request the Reliability Coordinator to declare an Energy Emergency Alert in accordance with Attachment 1-EOP-002 “Energy Emergency Alerts.”
- 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.” The Reliability Coordinator shall act to mitigate the emergency condition, including a request for emergency assistance if required.
- R9.** When a Transmission Service Provider expects to elevate the transmission service priority of an Interchange Transaction from Priority 6 (Network Integration Transmission Service from Non-designated Resources) to Priority 7 (Network Integration Transmission Service from designated Network Resources) as permitted in its transmission tariff:
 - R9.1.** The deficient Load-Serving Entity shall request its Reliability Coordinator to initiate an Energy Emergency Alert in accordance with Attachment 1-EOP-002 “Energy Emergency Alerts.”
 - R9.2.** The Reliability Coordinator shall submit the report to NERC for posting on the NERC Website, noting the expected total MW that may have its transmission service priority changed.
 - R9.3.** The Reliability Coordinator shall use EEA 1 to forecast the change of the priority of transmission service of an Interchange Transaction on the system from Priority 6 to Priority 7.
 - R9.4.** The Reliability Coordinator shall use EEA 2 to announce the change of the priority of transmission service of an Interchange Transaction on the system from Priority 6 to Priority 7.

C. Measures

- M1.** Each Reliability Coordinator and Balancing Authority shall have and provide upon request evidence that could include but is not limited to, job descriptions, signed agreements, authority letter signed by an appropriate officer of the company, or other equivalent evidence that will be used to confirm that it meets Requirement 1.
- M2.** If a Reliability Coordinator or Balancing Authority implements one or more actions described in its Capacity and Energy Emergency plan, that entity shall have and provide upon request evidence that could include but is not limited to, operator logs, voice recordings or transcripts of voice recordings, electronic communications, computer printouts or other equivalent evidence that will be used to determine if the actions it took to relieve emergency conditions were in conformance with its Capacity and Energy Emergency Plan. (Requirement 2)
- M3.** If a Balancing Authority experiences an operating Capacity or Energy Emergency it shall have and provide upon request evidence that could include, but is not limited to operator logs, voice recordings or transcripts of voice recordings, electronic communications, or other equivalent evidence that will be used to determine if it met Requirement 3.

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- M4.** The Balancing Authority shall have and provide upon request evidence (such as operator logs, work orders, E-Tags, or other evidence) that it took the actions described in R4 in response to anticipating a capacity or energy emergency.
- M5.** The Balancing Authority shall have and provide upon request evidence (such as operator logs, dispatch instructions, or other evidence) that it only used the assistance provided by the Interconnection frequency bias for the time needed to implement corrective actions and did not attempt to return Interconnection frequency to normal through unilateral adjustment of generation beyond that supplied through the frequency bias action and Interchange Schedule changes. (Requirement 5)
- M6.** The Balancing Authority shall have and provide upon request evidence (such as operator logs, dispatch instructions, or other evidence) that it took actions such as those listed in R6 to comply with CPS and DCS.
- M7.** The Balancing Authority shall have and provide upon request evidence (such as operator logs, voice recordings, or other evidence) that it took the actions listed in R7 when unable to resolve an emergency condition.
- M8.** If a Reliability Coordinator has any Balancing Authority within its Reliability Coordinator Area that has notified the Reliability Coordinator of a potential or actual Energy Emergency, the Reliability Coordinator involved in the event shall have and provide upon request evidence that could include, but is not limited to operator logs, voice recordings or transcripts of voice recordings, electronic communications, or other equivalent evidence to determine if it initiated an Energy Emergency Alert as specified in Requirement 8 and as detailed in Attachment 1-EOP-002 “Energy Emergency Alerts.”
- M9.** If a Transmission Service Provider expects to elevate the transmission service priority of an Interchange Transaction from Priority 6 (Network Integration Transmission Service from Non-designated Resources) to Priority 7 (Network Integration Transmission Service from designated Network Resources), the Reliability Coordinator involved in the event shall have and provide upon request evidence that could include, but is not limited to, NERC reports, EEA reports, operator logs, voice recordings or transcripts of voice recordings, electronic communications, or other equivalent evidence that will be used to determine if that Reliability Coordinator met Requirements 9.2, 9.3 and 9.4.

D. Compliance

1. Compliance Monitoring Process

1.1. Compliance Enforcement Authority

Regional Entity

1.2. Compliance Monitoring Period and Reset Timeframe

Not Applicable.

1.3. Compliance Monitoring and Enforcement Process

Compliance Audits

Self-Certifications

Spot Checking

Compliance Violation Investigations

Self-Reporting

Standard EOP-002-3.1 — Capacity and Energy Emergencies

Complaints

1.4. Data Retention

For Measure 1, each Reliability Coordinator and Balancing Authority shall keep The current in-force documents.

For Measure 2, 8 and 9 the Reliability Coordinator shall keep 90 days of historical data.

For Measure 3, 4, 5, 6, and 7 the Balancing Authority shall keep 90 days of historical data.

If an entity is found non-compliant the entity shall keep information related to the noncompliance until found compliant or for two years plus the current year, whichever is longer.

Evidence used as part of a triggered investigation shall be retained by the entity being investigated for one year from the date that the investigation is closed, as determined by the Compliance Monitor.

The Compliance Monitor shall keep the last periodic audit report and all requested and submitted subsequent compliance records.

1.5. Additional Compliance Information

None.

E. Regional Differences

None identified.

Version History

Version	Date	Action	Change Tracking
0	April 1, 2005	Effective Date	New
0	August 8, 2005	Removed “Proposed” from Effective Date	Errata
1	September 19, 2006	Changes R7. to refer to “Requirement 6” instead of “Requirement 7”	Errata
2	November 1, 2006	Adopted by Board of Trustees	Revised
2	November 1, 2006	Corrected numbering in Section A.4. “Applicability.”	Errata
2	October 1, 2007	Added to Section 1 inadvertently omitted “4.3. Load-Serving Entities	Errata
2.1	October 29, 2008	BOT adopted errata changes; updated version number to “2.1”	Errata
2.1	May 13, 2009	FERC Approved	Revised
3	June 4, 2010	Modified to address Order No. 693 Directives contained in paragraphs 582.	Revised.
3	August 5, 2010	Adopted by NERC Board of Trustees	New
3.1	March 8, 2012	Errata adopted by Standards Committee; (Updated title of Attachment 1 and changed	Errata

Standard EOP-002-3.1 — Capacity and Energy Emergencies

		references to Attachment 1 throughout Standard from “Attachment 1-EOP-002-0 Energy Emergency Alert Levels” to “Attachment 1-EOP-002 Energy Emergency Alerts”. Removed parenthetical in Requirement R9 referencing a retired Attachment in IRO-006)	
3.1	September 13, 2012	FERC Approved	Errata

Attachment 1-EOP-002 Energy Emergency Alerts

Introduction

This Attachment provides the procedures by which a Load Serving Entity can obtain capacity and energy when it has exhausted all other options and can no longer provide its customers' expected energy requirements. NERC defines this situation as an "Energy Emergency." NERC assumes that a capacity deficiency will manifest itself as an energy emergency.

The Energy Emergency Alert Procedure is initiated by the Load Serving Entity's Reliability Coordinator, who declares various Energy Emergency Alert levels as defined in Section B, "Energy Emergency Alert Levels," to provide assistance to the Load Serving Entity.

The Load Serving Entity who requests this assistance is referred to as an "Energy Deficient Entity."

NERC recognizes that Transmission Providers are subject to obligations under FERC-approved tariffs and other agreements, and nothing in these procedures should be interpreted as changing those obligations.

A. General Requirements

1. **Initiation by Reliability Coordinator.** An Energy Emergency Alert may be initiated only by a Reliability Coordinator at 1) the Reliability Coordinator's own request, or 2) upon the request of a Balancing Authority, or 3) upon the request of a Load Serving Entity.
 - 1.1. **Situations for initiating alert.** An Energy Emergency Alert may be initiated for the following reasons:
 - When the Load Serving Entity is, or expects to be, unable to provide its customers' energy requirements, and has been unsuccessful in locating other systems with available resources from which to purchase, or
 - The Load Serving Entity cannot schedule the resources due to, for example, Available Transfer Capability (ATC) limitations or transmission loading relief limitations.
2. **Notification.** A Reliability Coordinator who declares an Energy Emergency Alert shall notify all Balancing Authorities and Transmission Providers in its Reliability Area. The Reliability Coordinator shall also notify all other Reliability Coordinators of the situation via the Reliability Coordinator Information System (RCIS). Additionally, conference calls between Reliability Coordinators shall be held as necessary to communicate system conditions. The Reliability Coordinator shall also notify the other Reliability Coordinators when the alert has ended.

B. Energy Emergency Alert Levels

Introduction

To ensure that all Reliability Coordinators clearly understand potential and actual energy emergencies in the Interconnection, NERC has established three levels of Energy Emergency Alerts. The Reliability Coordinators will use these terms when explaining energy emergencies to each other. An Energy Emergency Alert is an emergency procedure, not a daily operating practice, and is not intended as an alternative to compliance with NERC reliability standards or power supply contracts.

The Reliability Coordinator may declare whatever alert level is necessary, and need not proceed through the alerts sequentially.

1. **Alert 1 — All available resources in use.**

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Circumstances:

- Balancing Authority, Reserve Sharing Group, or Load Serving Entity foresees or is experiencing conditions where all available resources are committed to meet firm load, firm transactions, and reserve commitments, and is concerned about sustaining its required Operating Reserves, and
- Non-firm wholesale energy sales (other than those that are recallable to meet reserve requirements) have been curtailed.

2. Alert 2 — Load management procedures in effect.

Circumstances:

- Balancing Authority, Reserve Sharing Group, or Load Serving Entity is no longer able to provide its customers' expected energy requirements, and is designated an Energy Deficient Entity.
- Energy Deficient Entity foresees or has implemented procedures up to, but excluding, interruption of firm load commitments. When time permits, these procedures may include, but are not limited to:
 - Public appeals to reduce demand.
 - Voltage reduction.
 - Interruption of non-firm end use loads in accordance with applicable contracts¹.
 - Demand-side management.
 - Utility load conservation measures.

During Alert 2, Reliability Coordinators, Balancing Authorities, and Energy Deficient Entities have the following responsibilities:

- 2.1 Notifying other Balancing Authorities and market participants.** The Energy Deficient Entity shall communicate its needs to other Balancing Authorities and market participants. Upon request from the Energy Deficient Entity, the respective Reliability Coordinator shall post the declaration of the alert level along with the name of the Energy Deficient Entity and, if applicable, its Balancing Authority on the NERC website.
- 2.2 Declaration period.** The Energy Deficient Entity shall update its Reliability Coordinator of the situation at a minimum of every hour until the Alert 2 is terminated. The Reliability Coordinator shall update the energy deficiency information posted on the NERC website as changes occur and pass this information on to the affected Reliability Coordinators, Balancing Authority, and Transmission Providers.
- 2.3 Sharing information on resource availability.** A Balancing Authority and market participants with available resources shall immediately contact the Energy Deficient Entity. This should include the possibility of selling non-firm (recallable) energy out of available Operating Reserves. The Energy Deficient Entity shall notify the Reliability Coordinators of the results.
- 2.4 Evaluating and mitigating transmission limitations.** The Reliability Coordinators shall review all System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs) and transmission loading relief procedures in effect that may limit the Energy Deficient Entity's scheduling capabilities. Where appropriate, the Reliability Coordinators shall inform

¹ For emergency, not economic, reasons.

Standard EOP-002-3.1 — Capacity and Energy Emergencies

the Transmission Providers under their purview of the pending Energy Emergency and request that they increase their ATC by actions such as restoring transmission elements that are out of service, reconfiguring their transmission system, adjusting phase angle regulator tap positions, implementing emergency operating procedures, and reviewing generation redispatch options.

2.4.1 Notification of ATC adjustments. Resulting increases in ATCs shall be simultaneously communicated to the Energy Deficient Entity and the market via posting on the appropriate OASIS websites by the Transmission Providers.

2.4.2 Availability of generation redispatch options. Available generation redispatch options shall be immediately communicated to the Energy Deficient Entity by its Reliability Coordinator.

2.4.3 Evaluating impact of current transmission loading relief events. The Reliability Coordinators shall evaluate the impact of any current transmission loading relief events on the ability to supply emergency assistance to the Energy Deficient Entity. This evaluation shall include analysis of system reliability and involve close communication among Reliability Coordinators and the Energy Deficient Entity.

2.4.4 Initiating inquiries on reevaluating SOLs and IROLs. The Reliability Coordinators shall consult with the Balancing Authorities and Transmission Providers in their Reliability Areas about the possibility of reevaluating and revising SOLs or IROLs.

2.5 Coordination of emergency responses. The Reliability Coordinator shall communicate and coordinate the implementation of emergency operating responses.

2.6 Energy Deficient Entity actions. Before declaring an Alert 3, the Energy Deficient Entity must make use of all available resources. This includes but is not limited to:

2.6.1 All available generation units are on line. All generation capable of being on line in the time frame of the emergency is on line including quick-start and peaking units, regardless of cost.

2.6.2 Purchases made regardless of cost. All firm and non-firm purchases have been made, regardless of cost.

2.6.3 Non-firm sales recalled and contractually interruptible loads and demand-side management curtailed. All non-firm sales have been recalled, contractually interruptible retail loads curtailed, and demand-side management activated within provisions of the agreements.

2.6.4 Operating Reserves. Operating reserves are being utilized such that the Energy Deficient Entity is carrying reserves below the required minimum or has initiated emergency assistance through its operating reserve sharing program.

3. Alert 3 — Firm load interruption imminent or in progress.

Circumstances:

- Balancing Authority or Load Serving Entity foresees or has implemented firm load obligation interruption. The available energy to the Energy Deficient Entity, as determined from Alert 2, is only accessible with actions taken to increase transmission transfer capabilities.

3.1 Continue actions from Alert 2. The Reliability Coordinators and the Energy Deficient Entity shall continue to take all actions initiated during Alert 2. If the emergency has not already been posted on the NERC website (see paragraph 2.1), the respective Reliability Coordinators will, at this time, post on the website information concerning the emergency.

Standard EOP-002-3.1 — Capacity and Energy Emergencies

- 3.2 Declaration Period.** The Energy Deficient Entity shall update its Reliability Coordinator of the situation at a minimum of every hour until the Alert 3 is terminated. The Reliability Coordinator shall update the energy deficiency information posted on the NERC website as changes occur and pass this information on to the affected Reliability Coordinators (via the RCIS), Balancing Authorities, and Transmission Providers.
- 3.3 Use of Transmission short-time limits.** The Reliability Coordinators shall request the appropriate Transmission Providers within their Reliability Area to utilize available short-time transmission limits or other emergency operating procedures in order to increase transfer capabilities into the Energy Deficient Entity.
- 3.4 Reevaluating and revising SOLs and IROLs.** The Reliability Coordinator of the Energy Deficient Entity shall evaluate the risks of revising SOLs and IROLs on the reliability of the overall transmission system. Reevaluation of SOLs and IROLs shall be coordinated with other Reliability Coordinators and only with the agreement of the Balancing Authority or Transmission Operator whose equipment would be affected. The resulting increases in transfer capabilities shall only be made available to the Energy Deficient Entity who has requested an Energy Emergency Alert 3 condition. SOLs and IROLs shall only be revised as long as an Alert 3 condition exists or as allowed by the Balancing Authority or Transmission Operator whose equipment is at risk. The following are minimum requirements that must be met before SOLs or IROLs are revised:
- 3.4.1 Energy Deficient Entity obligations.** The deficient Balancing Authority or Load Serving Entity must agree that, upon notification from its Reliability Coordinator of the situation, it will immediately take whatever actions are necessary to mitigate any undue risk to the Interconnection. These actions may include load shedding.
- 3.4.2 Mitigation of cascading failures.** The Reliability Coordinator shall use its best efforts to ensure that revising SOLs or IROLs would not result in any cascading failures within the Interconnection.
- 3.5 Returning to pre-emergency Operating Security Limits.** Whenever energy is made available to an Energy Deficient Entity such that the transmission systems can be returned to their pre-emergency SOLs or IROLs, the Energy Deficient Entity shall notify its respective Reliability Coordinator and downgrade the alert.
- 3.5.1 Notification of other parties.** Upon notification from the Energy Deficient Entity that an alert has been downgraded, the Reliability Coordinator shall notify the affected Reliability Coordinators (via the RCIS), Balancing Authorities, and Transmission Providers that their systems can be returned to their normal limits.
- 3.6 Reporting.** Any time an Alert 3 is declared, the Energy Deficient Entity shall submit the report enclosed in this Attachment to its respective Reliability Coordinator within two business days of downgrading or termination of the alert. Upon receiving the report, the Reliability Coordinator shall review it for completeness and immediately forward it to the NERC staff for posting on the NERC website. The Reliability Coordinator shall present this report to the Reliability Coordinator Working Group at its next scheduled meeting.
- 4. Alert 0 - Termination.** When the Energy Deficient Entity believes it will be able to supply its customers' energy requirements, it shall request of its Reliability Coordinator that the EEA be terminated.
- 4.1. Notification.** The Reliability Coordinator shall notify all other Reliability Coordinators via the RCIS of the termination. The Reliability Coordinator shall also notify the

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affected Balancing Authorities and Transmission Operators. The Alert 0 shall also be posted on the NERC website if the original alert was so posted.

C. Energy Emergency Alert 3 Report

A Deficient Balancing Authority or Load Serving Entity declaring an Energy Emergency Alert 3 must complete the following report. Upon completion of this report, it is to be sent to the Reliability Coordinator for review within two business days of the incident.

Requesting Balancing Authority:

Entity experiencing energy deficiency (if different from Balancing Authority):

Date/Time Implemented:

Date/Time Released:

Declared Deficiency Amount (MW):

Total energy supplied by other Balancing Authority during the Alert 3 period:

Conditions that precipitated call for “Energy Deficiency Alert 3”:

If “Energy Deficiency Alert 3” had not been called, would firm load be cut? If no, explain:

Explain what action was taken in each step to avoid calling for “Energy Deficiency Alert 3”:

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- 1. All generation capable of being on line in the time frame of the energy deficiency was on line (including quick start and peaking units) without regard to cost.**

- 2. All firm and nonfirm purchases were made regardless of cost.**

- 3. All nonfirm sales were recalled within provisions of the sale agreement.**

- 4. Interruptible load was curtailed where either advance notice restrictions were met or the interruptible load was considered part of spinning reserve.**

- 5. Available load reduction programs were exercised (public appeals, voltage reductions, etc.).**

- 6. Operating Reserves being utilized.**

Comments:

Standard EOP-002-3.1 — Capacity and Energy Emergencies

Reported By:

Organization:

Title:

*** FOR INFORMATIONAL PURPOSES ONLY ***

Enforcement Dates: Standard EOP-002-3.1 — Capacity and Energy Emergencies

United States

Standard	Requirement	Enforcement Date	Inactive Date
EOP-002-3.1	All	09/13/2012	

Standard EOP-003-2— Load Shedding Plans

A. Introduction

1. **Title:** Load Shedding Plans
2. **Number:** EOP-003-2
3. **Purpose:** A Balancing Authority and Transmission Operator operating with insufficient generation or transmission capacity must have the capability and authority to shed load rather than risk an uncontrolled failure of the Interconnection.
4. **Applicability:**
 - 4.1. Transmission Operators.
 - 4.2. Balancing Authorities.
5. **Effective Date:** One year following the first day of the first calendar quarter after applicable regulatory approvals (or the standard otherwise becomes effective the first day of the first calendar quarter after NERC Board of Trustees adoption in those jurisdictions where regulatory approval is not required).

B. Requirements

- R1.** After taking all other remedial steps, a Transmission Operator or Balancing Authority operating with insufficient generation or transmission capacity shall shed customer load rather than risk an uncontrolled failure of components or cascading outages of the Interconnection. *[Violation Risk Factor: High]*
- R2.** Each Transmission Operator shall establish plans for automatic load shedding for undervoltage conditions if the Transmission Operator or its associated Transmission Planner(s) or Planning Coordinator(s) determine that an under-voltage load shedding scheme is required. *[Violation Risk Factor: High]*
- R3.** Each Transmission Operator and Balancing Authority shall coordinate load shedding plans, excluding automatic under-frequency load shedding plans, among other interconnected Transmission Operators and Balancing Authorities. *[Violation Risk Factor: High]*
- R4.** A Transmission Operator shall consider one or more of these factors in designing an automatic under voltage load shedding scheme: voltage level, rate of voltage decay, or power flow levels. *[Violation Risk Factor: High]*
- R5.** A Transmission Operator or Balancing Authority shall implement load shedding, excluding automatic under-frequency load shedding, in steps established to minimize the risk of further uncontrolled separation, loss of generation, or system shutdown. *[Violation Risk Factor: High]*
- R6.** After a Transmission Operator or Balancing Authority Area separates from the Interconnection, if there is insufficient generating capacity to restore system frequency following automatic underfrequency load shedding, the Transmission Operator or Balancing Authority shall shed additional load. *[Violation Risk Factor: High]*
- R7.** The Transmission Operator shall coordinate automatic undervoltage load shedding throughout their areas with tripping of shunt capacitors, and other automatic actions that will occur under abnormal voltage, or power flow conditions. *[Violation Risk Factor: High]*
- R8.** Each Transmission Operator or Balancing Authority shall have plans for operator controlled manual load shedding to respond to real-time emergencies. The Transmission Operator or

Standard EOP-003-2— Load Shedding Plans

Balancing Authority shall be capable of implementing the load shedding in a timeframe adequate for responding to the emergency. *[Violation Risk Factor: High]*

C. Measures

- M1.** Each Transmission Operator that has or directs the deployment of undervoltage load shedding facilities, shall have and provide upon request, its automatic load shedding plans. (Requirement 2)
- M2.** Each Transmission Operator and Balancing Authority shall have and provide upon request its manual load shedding plans that will be used to confirm that it meets Requirement 8. (Part 1)

D. Compliance

1. Compliance Monitoring Process

1.1. Compliance Monitoring Responsibility

Regional Reliability Organizations shall be responsible for compliance monitoring.

1.2. Compliance Monitoring

One or more of the following methods will be used to assess compliance:

- Self-certification (Conducted annually with submission according to schedule.)
- Spot Check Audits (Conducted anytime with up to 30 days notice given to prepare.)
- Periodic Audit (Conducted once every three years according to schedule.)
- Triggered Investigations (Notification of an investigation must be made within 60 days of an event or complaint of noncompliance. The entity will have up to 30 days to prepare for the investigation. An entity may request an extension of the preparation period and the extension will be considered by the Compliance Monitor on a case-by-case basis.)

1.3. Additional Reporting Requirement

No additional reporting required.

1.4. Data Retention

Each Balancing Authority and Transmission Operator shall have its current, in-force load shedding plans.

If an entity is found non-compliant the entity shall keep information related to the noncompliance until found compliant or for two years plus the current year, whichever is longer.

Evidence used as part of a triggered investigation shall be retained by the entity being investigated for one year from the date that the investigation is closed, as determined by the Compliance Monitor.

The Compliance Monitor shall keep the last periodic audit report and all requested and submitted subsequent compliance records.

1.5. Additional Compliance Information

None

Standard EOP-003-2— Load Shedding Plans

2. Violation Severity Levels

R#	Lower VSL	Moderate VSL	High VSL	Severe VSL
R1.	N/A	N/A	N/A	The Transmission Operator or Balancing Authority failed to shed customer load.
R2	N/A	N/A	N/A	The Transmission Operator did not establish plans for automatic load shedding for undervoltage conditions as directed by the requirement.
R3.	The responsible entity did not coordinate load shedding plans, as directed by the requirement, affecting 5% or less of its required entities.	The responsible entity did not coordinate load shedding plans, as directed by the requirement, affecting more than 5% up to (and including) 10% of its required entities.	The responsible entity did not coordinate load shedding plans, as directed by the requirement, affecting more than 10%, up to (and including) 15% or less, of its required entities.	The responsible entity did not coordinate load shedding plans, as directed by the requirement, affecting more than 15% of its required entities.
R4.	N/A	N/A	N/A	The Transmission Operator failed to consider at least one of the three elements voltage level, rate of voltage decay, or power flow levels) listed in the requirement.
R5.	N/A	N/A	N/A	The Transmission Operator or Balancing Authority failed to implement load shedding in steps established to minimize the risk of further uncontrolled separation, loss of generation, or system shutdown.

Standard EOP-003-2— Load Shedding Plans

R#	Lower VSL	Moderate VSL	High VSL	Severe VSL
R6.	N/A	N/A	N/A	The Transmission Operator or Balancing Authority failed to shed additional load after it had separated from the Interconnection when there was insufficient generating capacity to restore system frequency following automatic underfrequency load shedding.
R7.	The Transmission Operator did not coordinate automatic undervoltage load shedding with 5% or less of the types of automatic actions described in the Requirement.	The Transmission Operator did not coordinate automatic undervoltage load shedding with more than 5% up to (and including) 10% of the types of automatic actions described in the Requirement.	The Transmission Operator did not coordinate automatic undervoltage load shedding with more than 10% up to (and including) 15% of the types of automatic actions described in the Requirement.	The Transmission Operator did not coordinate automatic undervoltage load shedding with more than 15% of the types of automatic actions described in the Requirement.
R8.	N/A	The responsible entity did not have plans for operator controlled manual load shedding, as directed by the requirement.	The responsible entity has plans for manual load shedding but did not have the capability to implement the load shedding, as directed by the requirement.	The responsible entity did not have plans for operator controlled manual load shedding, as directed by the requirement nor had the capability to implement the load shedding, as directed by the requirement.

Standard EOP-003-2— Load Shedding Plans

E. Regional Differences

None identified.

Version History

Version	Date	Action	Change Tracking
0	April 1, 2005	Effective Date	New
0	August 8, 2005	Removed “Proposed” from Effective Date	Errata
1	November 1, 2006	Adopted by Board of Trustees	Revised
2	November 4, 2010	Adopted by Board of Trustees; Modified R4, R5, R6 and associated VSLs for R2, R4, and R7 to clarify that the requirements don’t apply to automatic underfrequency load shedding.	Revised to eliminate redundancies with PRC-006-1
2	May 7, 2012	FERC Order issued approving EOP-003-2 (approval becomes effective July 10, 2012)	

*** FOR INFORMATIONAL PURPOSES ONLY ***

Enforcement Dates: Standard EOP-003-2 — Load Shedding Plans

United States

Standard	Requirement	Enforcement Date	Inactive Date
EOP-003-2	All	10/01/2013	

Directive Summary	Document Reference	Publication Date	Reference	Standard	Full Text
S- Ref 10063 - We direct the ERO to determine the optimum number of continent-wide system states and their attributes and to modify the Reliability Standards through the Reliability Standards development process to accomplish this objective.	Order 693	16-Mar-07	Para 561	EOP-001	561. As we noted in the NOPR, some control areas define and effectively use more than the "normal," "alert" and "emergency" system states included in the Blackout Report recommendation. We proposed that the ERO determine the optimum number of system states to be employed continent-wide and to consider the addition of the restoration state. Accordingly, we direct the ERO to determine the optimum number of continent-wide system states and their attributes and to modify the Reliability Standard through the Reliability Standards development process to accomplish this objective.
S- Ref 10064 - Consider a pilot program (field test) for the system states proposal.	Order 693	16-Mar-07	Para 562	EOP-001	562. Further, we agree with ISO-NE that the proposed modification should be field tested and that policies and procedure be put in place, including operator training, before any processes for continent-wide system states are implemented. Such testing will help assure that all applicable entities and their personnel understand how the terms will be used and will allow operators to train staff to make any necessary changes to their policies and procedures. We direct the ERO to consider such a pilot program as it modifies EOP-001-0 through the Reliability Standards development process.
S- Ref 10065 - Clarifies that the actual emergency plan elements, and not the for consideration elements of Attachment 1, should be the basis for compliance.	Order 693	16-Mar-07	Para 565	EOP-001	565. The Commission agrees with ISO-NE that the Reliability Standard should be clarified to indicate that the actual emergency plan elements, and not the "for consideration" elements of Attachment 1, should be the basis for compliance. However, all of the elements should be considered when the emergency plan is put together.
S- Ref 10066 - Address emergencies resulting not only from insufficient generation but also insufficient transmission capability, particularly as it affects the implement of the capacity and energy emergency plan.	Order 693	16-Mar-07	Para 571	EOP-002	571. As we stated in the NOPR, neither EOP-002-2 nor any other Reliability Standard addresses the impact of inadequate transmission during generation emergencies. The Commission agrees with MRO that "insufficient transmission capability" could be due to various causes. The ERO should examine whether to clarify this term in the Reliability Standards development process.
S- Ref 10067 - Include all technically feasible resource options, including demand response and generation resources	Order 693	16-Mar-07	Para 573	EOP-002	573. The Commission agrees with FirstEnergy that for demand-side resources to qualify as another tool for balancing authorities to use in meeting control performance and disturbance control Reliability Standards, they must meet comparable technical performance requirements as generation resource options. In response to comments from Comverge and APPA, the Commission believes that curtailable loads are adequately addressed in Requirement R6 of the Reliability Standard but that demand response is not covered. Demand response covers considerably more resources than interruptible load. Accordingly, the Commission directs the ERO to modify the Reliability Standard to include all technically feasible resource options in the management of emergencies. These options should include generation resources, demand response resources and other technologies that meet comparable technical performance requirements.
S- Ref 10072 - Develop specific minimum load shedding capability that should be provided .. based on overarching nationwide criteria that take into account system characteristics.	Order 693	16-Mar-07	Para 595	EOP-003	595. The Commission concludes that the Reliability Standard needs to be modified to ensure that adequate load shedding capabilities are provided so that system operators have an effective operating measure of last resort to contain system emergencies and prevent cascading. The Commission recognizes that the amount of load shedding capability required is dependent on system characteristics and therefore it may not be feasible to have a uniform nationwide load shedding capability. This, however, does not preclude a uniform nationwide criterion on the methodology for establishing load shedding capability that would specify the minimum amount of load shedding capability that should be provided based on system characteristics and conditions and the maximum amount of delay before load shedding can be implemented. The Commission directs the ERO to address the minimum load and maximum time concerns of the Commission through the Reliability Standards development process. We suggest that a review of industry best practices would be useful in developing nationwide criteria.

NOTE: The FYRT suggested revisions to Attachment 1 that may address this directive.

NOTE: This language is no longer in the standard.

NOTE: See Para 572 for more specific recommendations.

NOTE: May want to perform a data request to see what industry is doing today and attempt to develop a "floor". See also Para 603.

S- Ref 10073 - Require periodic drills of simulated load shedding.	Order 693	16-Mar-07	Para 597	EOP-003	597. As suggested by California PUC, periodic drills of simulated load shedding should involve all participants required to ensure successful implementation of load shedding plans. As such, the drills should extend beyond system operators to distribution operators and LSEs. The Reliability Standard should require periodic drills by entities subject to section 215, and require those entities to seek participation by other entities. The drills should test the readiness and functionality of the load shedding plans, including, at times, the actual deployment of personnel. Therefore the Commission disagrees with FirstEnergy that the requirement for periodic drills of simulated load shedding should be incorporated into the new PER-005-0 Reliability Standard that is currently being drafted to address operator training.
S- Ref 10074 - Consider comments from APPA in the standards development process.	Order 693	16-Mar-07	Para 601	EOP-003	
548. Further we agree with SoCal Edison that clear direction is needed on which requirements should be exclusive to transmission operators and balancing authorities with the reliability coordinator being responsible for incorporating this information into its overarching plan. Accordingly, the Commission finds the reliability coordinator is a necessary entity under EOP-001-0 and directs the ERO to modify the Reliability Standard to include the reliability coordinator as an applicable entity. In addition, the ERO should consider SoCal Edison's suggestion in the ERO's Reliability Standards development process.	Order 693	16-Mar-07	Para 548	EOP-001	548. Further we agree with SoCal Edison that clear direction is needed on which requirements should be exclusive to transmission operators and balancing authorities with the reliability coordinator being responsible for incorporating this information into its overarching plan. Accordingly, the Commission finds the reliability coordinator is a necessary entity under EOP-001-0 and directs the ERO to modify the Reliability Standard to include the reliability coordinator as an applicable entity. In addition, the ERO should consider SoCal Edison's suggestion in the ERO's Reliability Standards development process.

NOTE: See para 603 also.

APPA Comments are in Paragraph 598: "In addition, APPA states that NERC should consider requiring balancing authorities and transmission operators to expand coordination and planning of their automatic and manual load shedding plans to include their respective Regional Entities, reliability coordinators and generation owners."