Note: an Interpretation cannot be used to change a standard.

Request for an Interpretation of a Reliability Standard

Date submitted: October 15, 2009

Date accepted: November 30, 2009

Contact information for person requesting the interpretation:

Name: Thomas E Washburn

Organization: Florida Municipal Power Pool

Telephone: 407-384-4066

E-mail: <u>twashburn@ouc.com</u>

Identify the standard that needs clarification:

Standard Number (include version number): EOP-001-1 and EOP-001-2

Standard Title: Emergency Operations Planning

Identify specifically what requirement needs clarification:

Requirement Number and Text of Requirement:

R2.2. Develop, maintain, and implement a set of plans to mitigate operating emergencies on the transmission system.

Clarification needed:

According to the NERC Functional Model, the BA is responsible for maintaining load-generationinterchange balance within the BA Area and supports interconnection frequency in real-time. This is done using frequency control through tie-line bias, regulation service deployment, load-following through economic dispatch, and interchange implementation. The BA is not responsible for plans to mitigate operating emergencies on the transmission system. The BA does follow the directives of the TOP when they are implementing their plans.

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?

Identify the material impact associated with this interpretation:

Identify the material impact to your organization or others caused by the lack of clarity or an incorrect interpretation of this standard.

Not having the correct interpretation of this requirement could cause the BA to be found non-compliant.