NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

NERC

Mapping Document

Project 2015-08 Emergency Operations

Standard: EOP-004-4		
Requirement in Approved Standard	Translation to New Standard or Other Action	Description and Change Justification
EOP-004-03, Requirement R2 R2. Each Responsible Entity shall report events per their Operating Plan within 24 hours of recognition of meeting an event type threshold for reporting or by the end of the next business day if the event occurs on a weekend (which is recognized to be 4 PM local time on Friday to 8 AM Monday local time).	EOP-004-04, Requirement R2 R2. Each Responsible Entity shall report events specified in EOP-004-4 Attachment 1 to the entities specified per their event reporting Operating Plan by the later of 24 hours of recognition of meeting an event type threshold for reporting or by the end of the Responsible Entity's next business day (4 p.m. local time will be considered the end of the business day).	Requirement R2 revisions were to provide for clarity; to remove the ambiguity for weekends and to add clarity for holidays.
EOP-004-03, Requirement R3 R3. Each Responsible Entity shall validate all contact information contained in the Operating Plan pursuant to Requirement R1 each calendar year.	Recommended for retirement.	The EOP SDT recommends retirement of Requirement R3 under Criterion B1, administrative; the R3 requirement in EOP- 004-3 requires responsible entities to perform a function that is administrative in nature, does not support reliability and is needlessly burdensome. Contact lists are administrative in nature.

Standard: EOP-004-4		
Requirement in Approved Standard	Translation to New Standard or Other Action	Description and Change Justification
EOP-004-03, Attachment 1 Event Type: Damage or destruction of a Facility Entity with Reporting Responsibility: BA, TO, TOP, GO, GOP, DP Threshold for Reporting: Damage or destruction of its Facility that results from actual or suspected intentional human action.	EOP-004-04, Attachment 1 Event Type: Damage or destruction of its Facility Entity with Reporting Responsibility: TO, TOP, GO, GOP, DP Threshold for Reporting: Damage or destruction of its Facility that results from actual or suspected intentional human action. It is not necessary to report theft unless it degrades normal operation of its Facility.	The EOP SDT wanted to change the reporting responsibility to the Facility owner. It is the responsibility to the Facility owner, as the Threshold states. The EOP SDT used the defined term "Facility" to add clarity for several events listed in Attachment 1. A Facility is defined as: "A set of electrical equipment that operates as a single Bulk Electric System Element (e.g., a line, a generator, a shunt compensator, transformer, etc.)" With the specific entities listed for reporting, the event type and reporting entity better aligns with the word change from "a Facility" to "its Facility."
EOP-004-03, Attachment 1 Event Type: Physical threats to a Facility Entity with Reporting Responsibility: BA, TO, TOP, GO, GOP, DP	EOP-004-04, Attachment 1 Event Type: Physical threats to its Facility Entity with Reporting Responsibility: TO, TOP, GO, GOP, DP	The EOP SDT wanted to change the reporting responsibility to the Facility owner. It is the responsibility to the Facility owner, as the Threshold states. The EOP SDT used the defined term "Facility" to add clarity for several events listed in
Threshold for Reporting: Physical threat to its Facility excluding weather or natural disaster	Threshold for Reporting: Physical threat to its Facility excluding weather or natural	Attachment 1. A Facility is defined as:

Standard: EOP-004-4		
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related threats, which has the potential to degrade the normal operation of the Facility. OR Suspicious device or activity at a Facility. Do not report theft unless it degrades normal operation of a Facility.	disaster related threats, which has the potential to degrade the normal operation of the Facility. OR Suspicious device or activity at its Facility.	 "A set of electrical equipment that operates as a single Bulk Electric System Element (e.g., a line, a generator, a shunt compensator, transformer, etc.)" With the specific entities listed for reporting, the event type and reporting entity better aligns with the word change from "a Facility" to "its Facility."
EOP-004-03, Attachment 1 Event Type: Physical threats to a BES control center	EOP-004-04, Attachment 1 Event Type: Physical threats to its BES control center	With the specific entities listed for reporting, the event type and reporting entity better aligns with the word change
Entity with Reporting Responsibility: RC, BA, TOP	Entity with Reporting Responsibility: RC, BA, TOP	from "a BES control center" to "its BES control center."
Threshold for Reporting: Physical threat to its BES control center, excluding weather or natural disaster related threats, which has the potential to degrade the normal operation of the control center.	Threshold for Reporting: Physical threat to its BES control center, excluding weather or natural disaster related threats, which has the potential to degrade the normal operation of the control center.	

Standard: EOP-004-4		
Requirement in Approved Standard	Translation to New Standard or Other Action	Description and Change Justification
OR	OR	
Suspicious device or activity at a BES control center.	Suspicious device or activity at its BES control center.	
EOP-004-03, Attachment 1	EOP-004-04, Attachment 1	To maintain the continuity of the BES was
Event Type: BES Emergency requiring public appeal for load reduction	Event Type: Public appeal for load reduction resulting from a BES Emergency	added to better align with the DOE OE-417 reporting category.
Entity with Reporting Responsibility: Initiating entity is responsible for reporting Threshold for Reporting: Public appeal for load reduction event.	Entity with Reporting Responsibility: BA Threshold for Reporting: Public appeal for load reduction to maintain continuity of the BES.	Rationale: The EOP SDT changed the reporting responsibility to the BA only based on the BA requirements in EOP-011-1 (FERC approved, pending enforcement) Requirement R2 "Each Balancing Authority shall develop, maintain, and implement one or more Reliability Coordinator-reviewed Operating Plan(s) to mitigate Capacity Emergencies and Energy Emergencies within its Balancing Authority Area. The Operating Plan(s) shall include the following, as applicable: [Violation Risk Factor: High] [Time Horizon: Real-Time Operations, Operations Planning, Long-term Planning] 2.1. Roles and responsibilities for activating the Operating Plan(s);

Standard: EOP-004-4		
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		 2.2. Processes to prepare for and mitigate Emergencies including: 2.2.1. Notification to its Reliability Coordinator, to include current and projected conditions when experiencing a Capacity Emergency or Energy Emergency; 2.2.2. Requesting an Energy Emergency Alert, per Attachment 1; 2.2.3. Managing generating resources in its Balancing Authority Area to address: 2.2.3.1. capability and availability; 2.2.3.2. fuel supply and inventory concerns; 2.2.3.4. environmental constraints. 2.2.4. Public appeals for voluntary Load reductions;
EOP-004-03, Attachment 1 Event Type: BES Emergency requiring system- wide voltage reduction Entity with Reporting Responsibility: Initiating entity is responsible for reporting	EOP-004-04, Attachment 1 Event Type: System-wide voltage reduction Entity with Reporting Responsibility: TOP Threshold for Reporting: System-wide voltage reduction of 3% or more to maintain the continuity of the BES.	The TOP is operating the system and is the only entity that would implement system- wide voltage reduction.

Standard: EOP-004-4		
Requirement in Approved Standard	Translation to New Standard or Other Action	Description and Change Justification
Threshold for Reporting: System wide voltage reduction of 3% or more.		
EOP-004-03, Attachment 1	EOP-004-04, Attachment 1	The RC, BA and TOP are the entities that
Event Type: BES Emergency requiring manual firm load shedding	Event Type: Firm load shedding resulting from a BES Emergency	would initiate manual firm load shedding.
Entity with Reporting Responsibility: Initiating entity is responsible for reporting	Entity with Reporting Responsibility: Initiating RC, BA, TOP	
Threshold for Reporting: Manual firm load shedding ≥ 100 MW.	Threshold for Reporting: Firm load shedding ≥ 100 MW (manual or automatic).	
EOP-004-03, Attachment 1 Event Type: BES Emergency resulting in automatic firm load shedding Entity with Reporting Responsibility: DP, TOP Threshold for Reporting: Automatic firm load shedding ≥ 100 MW (via automatic undervoltage or underfrequency load shedding schemes, or RAS).	This Event Type/Entity with Reporting Responsibility/Threshold for Reporting has been merged with Event Type: Firm load shedding resulting from a BES Emergency.	This Event Type/Entity with Reporting Responsibility/Threshold for Reporting has been merged with Event Type: Firm load shedding resulting from a BES Emergency.
EOP-004-03, Attachment 1 Event Type: Voltage deviation on a Facility	EOP-004-04, Attachment 1	To provide clarity to the Event Type and to the Threshold for Reporting, the language revisions were made.

Standard: EOP-004-4		
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Entity with Reporting Responsibility: TOP Threshold for Reporting: Observed within its area a voltage deviation of ± 10% of nominal voltage sustained for ≥ 15 continuous minutes.	Event Type: BES Emergency resulting in voltage deviation on a Facility Entity with Reporting Responsibility: TOP Threshold for Reporting: A voltage deviation of =/> \pm 10% of nominal voltage sustained for \geq 15 continuous minutes.	
EOP-004-03, Attachment 1 Event Type: IROL Violation (all Interconnections) or SOL Violation for Major WECC Transfer Paths (WECC only) Entity with Reporting Responsibility: RC Threshold for Reporting: Operate outside the IROL for time greater than IROL T _v (all Interconnections) or Operate outside the SOL for more than 30 minutes for Major WECC Transfer Paths (WECC only).	This Event Type/Entity with Reporting Responsibility/Threshold for Reporting is proposed for retirement.	This Event Type/Entity with Reporting Responsibility/Threshold for Reporting is proposed for retirement. Event Type: IROL Violation (all Interconnections) or SOL Violation for Major WECC Transfer Paths (WECC only) are in the new standard TOP-001-3, Requirement R12 that becomes effective on 4/1/17, requiring a self-report if Tv is exceeded; the TOP-007- WECC-1 standard is pending retirement.
EOP-004-03, Attachment 1 Event Type: Loss of firm load Entity with Reporting Responsibility: BA, TOP, DP	EOP-004-04, Attachment 1 Event Type: Uncontrolled loss of firm load resulting from a BES Emergency	To provide clarity to the Threshold for Reporting and to align with the DOE's OE- 417 reporting category, language revisions were made.

Standard: EOP-004-4		
Requirement in Approved Standard	Translation to New Standard or Other Action	Description and Change Justification
Threshold for Reporting: Loss of firm load for ≥ ≥ 300 MW for entities with previous yea 3,000 MW OR ≥ 200 MW for all other entities	Entity with Reporting Responsibility: BA, TOP, DP Threshold for Reporting: Uncontrolled loss of firm load for \geq 15 Minutes from a single incident: \geq 300 MW for entities with previous year's peak demand \geq 3,000 MW OR \geq 200 MW for all other entities	
EOP-004-03, Attachment 1 Event Type: Generation loss Entity with Reporting Responsibility: BA, GOP Threshold for Reporting: Total generation loss, within one minute, of : ≥ 2,000 MW for entities in the Eastern or Western Interconnection OR ≥ 1,000 MW for entities in the ERCOT or Quebec Interconnection	EOP-004-04, Attachment 1 Event Type: Generation loss Entity with Reporting Responsibility: BA Threshold for Reporting: Total generation loss, within one minute, of: ≥ 2,000 MW in the Eastern, Western, or Quebec Interconnection OR ≥ 1,400 MW in the ERCOT Interconnection	The EOP SDT removed the reporting requirement from the GOPs to reduce redundant reporting. The BA should do the reporting given they have the generation status information. Technical justification for reverting back to the value of 2,000 MW for the generation loss for the Québec Interconnection and for harmonizing with NERC EA process. 1. Generation in the Québec Interconnection is 95 % hydraulic. To be efficient, generation must

	Standard: EOP-004-4		
Requirement in Approved Standard	Translation to New Standard or Other Action	Description and Change Justification	
		 operate within 80 % of its operating range. There is a large spinning reserve available at all times which aids in the recovery period after an event (ACE-Area Control Error). Historically, the recorded average ACE recovery time for a 2,000 MW loss is 5 minutes which is 3 times faster than the standard requirement of 15 minutes. <u>BAL-002-1a (R4.2)</u>. 2. Based on the Hydro Québec's generation loss reports, generation loss between 1,500 MW to 2,000 MW does not trig the first stage threshold of the UFLS scheme. The frequency stayed above the underfrequency limit. 3. In order to maintain the integrity of the Québec system, the RPTC SPS in Québec (Generation Rejection and Remote Load Shedding) is designed to detect abnormal or 	

Standard: EOP-004-4		
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		 predetermined system conditions, to take corrective actions and to deliberately remove up to 1,500 MW of preselected generation from the power system. Consequently, the system is design to remain stable upon the instantaneous loss of 1,500 MW of generation. For Hydro-Québec, a generation loss of more than 2,000 MW is considered as an issue, which is make sense with previous 2,000 MW generation loss reporting requirement. 4. The EEA Level 3 alert (EOP-002) in Québec is set generally set at 2,000 MW, based on the deficiency of operating reserves and margins. Up to now, no EEA Level 3 alert has occurred in the Québec Interconnection. 5. Hydro Québec's loss of generation in first contingency (n-1) is set around 2,000 MW.

Standard: EOP-004-4		
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		Technical justification for ERCOT 1,400 MW for the generation loss for the ERCOT Interconnection.
		 ERCOT maintains a mix of operating reserves (typically 50% Load Resources controlled by under- frequency relays and 50% frequency responsive spinning reserves) available at all times, which aids in the recovery period after an event affecting Area Control Error (ACE) of frequency. ERCOT typically procure between 2,300 MW to 3,000 MW of frequency responsive reserves for a operating hours besides procuring additional regulation and non- spinning reserves. The Load Resources controlled by Under- Frequency relay are set to respond automatically at 59.7 Hz to provide instantaneous frequency response.

	Standard: EOP-004-4		
Requirement in Approved Standard	Translation to New Standard or Other Action	Description and Change Justification	
		 Historically, the recorded average ACE recovery time for a 1,400 MW loss is less than 10 minutes, which is much faster than the standard requirement of 15 minutes. <u>BAL-002-1a (R4.2)</u>. 2. The design criteria for ERCOT's frequency responsive reserves is to procure adequate reserves that allow frequency to stay above the under-frequency limit for up to ERCOT's resource contingency criteria limit of 2,750 MW. 3. The EEA level 1 alert (EOP-002) in ERCOT is set at 2,300 MW of Physical Responsive Capability (PRC) which is a mix of operating reserves (typically 50% Load Resources and 50% frequency responsive spinning reserves). 	

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EOP-004-03, Attachment 1 Event Type: Complete loss of off-site power to a nuclear generating plant (grid supply) Entity with Reporting Responsibility: TO, TOP Threshold for Reporting: Complete loss of off- site power affecting a nuclear generating station per the Nuclear Plant Interface Requirement	EOP-004-04, Attachment 1 Event Type: Complete loss of off-site power to a nuclear generating plant (grid supply) Entity with Reporting Responsibility: TO, TOP Threshold for Reporting: Complete loss of off-site power (LOOP) affecting a nuclear generating station per the Nuclear Plant Interface Requirement	The Event Analysis Program (EAP) refers to loss of off-site power as "(LOOP)". Therefore, LOOP has been added to the Threshold for Reporting to provide consistency.		
EOP-004-03, Attachment 1 Event Type: Transmission loss Entity with Reporting Responsibility: TOP Threshold for Reporting: Unexpected loss within its area, contrary to design, of three or more BES Elements caused by a common disturbance (excluding successful automatic reclosing).	EOP-004-04, Attachment 1 Event Type: Transmission loss Entity with Reporting Responsibility: TOP Threshold for Reporting: Unexpected loss within its area, contrary to design, of three or more BES Facilities caused by a common disturbance (excluding successful automatic reclosing).	The definition of BES Element includes generation. The reporting requirement for this Event Type is the TOP. The TOP does not have the visibility to report for the GO and/or the GOP for this Event Type. It could lead to confusion as to the element count for three elements contrary to design. In addition, the EAP uses the definition of "BES Facility" in its application, which could lead to additional confusion in evaluating a reporting during an event. The EOP SDT revised "BES Elements" to "BES Facilities" to add clarity to the Threshold for Reporting and to align with the EAP language.		

Standard: EOP-004-4				
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EOP-004-03, Attachment 1 Event Type: Unplanned BES control center evacuation Entity with Reporting Responsibility: RC, BA, TOP Threshold for Reporting: Unplanned evacuation from BES control center facility for 30 continuous minutes or more.	EOP-004-04, Attachment 1 Event Type: Unplanned evacuation of its BES control center Entity with Reporting Responsibility: RC, BA, TOP Threshold for Reporting: Unplanned evacuation from its BES control center facility for 30 continuous minutes or more.	In the Threshold for Reporting, with the specific entities listed for reporting, the event type and reporting entity better aligns with the word change from "BES control center" to "its BES control center."		
EOP-004-03, Attachment 1 Event Type: Complete loss of voice communication capability Entity with Reporting Responsibility: RC, BA, TOP Threshold for Reporting: Complete loss of voice communication capability affecting a BES control center for 30 continuous minutes or more.	EOP-004-04, Attachment 1 Event Type: Complete loss of Interpersonal Communication and Alternative Interpersonal Communication capability at its staffed BES control center Entity with Reporting Responsibility: RC, BA, TOP Threshold for Reporting: Complete loss of Interpersonal Communication and Alternative Interpersonal Communication capability affecting its staffed BES control center for 30 continuous minutes or more.	COM-001-2 defined Interpersonal Communication for the NERC Glossary of Terms as: "Any medium that allows two or more individuals to interact, consult, or exchange information." And Alternative Interpersonal Communication as: "Any Interpersonal Communication that is able to serve as a substitute for, and does not utilize the same infrastructure (medium) as, Interpersonal Communication used for day-to-day operation."		

Standard: EOP-004-4			
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EOP-004-03, Attachment 1 Event Type: Complete loss of monitoring capability Entity with Reporting Responsibility: RC, BA, TOP Threshold for Reporting: Complete loss of monitoring capability affecting a BES control center for 30 continuous minutes or more such that analysis capability (i.e., State Estimator or Contingency Analysis) is rendered inoperable.	EOP-004-04, Attachment 1 Event Type: Complete loss of monitoring or control capability at its staffed BES control center Entity with Reporting Responsibility: RC, BA, TOP Threshold for Reporting: Complete loss of monitoring or control capability at its staffed BES control center for 30 continuous minutes or more.	The language revisions to this event type provides clarity to the Threshold for Reporting and better aligns with the EAP language.	