# Standard Development Timeline

This section is maintained by the drafting team during the development of the standard and will be removed when the standard becomes effective.

# **Description of Current Draft**

EOP-004-4 is being posted for a 45-day formal comment period with ballot.

Completed Actions	Date
Standards Committee approved Standard Authorization Request (SAR) for posting	07/15/2015
SAR posted for comment	07/21/2015 - 08/19/2015
45-day formal comment period with ballot	07/25/2016 – 09/08/2016
45-day formal comment period with additional ballot	11/18/2016 – 01/06/2016

Anticipated Actions	Date
10-day final ballot	01/05/2017 – 01/16/2017
NERC Board (Board) adoption	February 2017

# New or Modified Term(s) Used in NERC Reliability Standards

This section includes all new or modified terms used in the proposed standard that will be included in the *Glossary of Terms Used in NERC Reliability Standards* upon applicable regulatory approval. Terms used in the proposed standard that are already defined and are not being modified can be found in the *Glossary of Terms Used in NERC Reliability Standards*. The new or revised terms listed below will be presented for approval with the proposed standard. Upon Board adoption, this section will be removed.

Term(s):

None.

When this standard receives Board adoption, the rationale boxes will be moved to the Supplemental Material Section of the standard.

### A. Introduction

- **1. Title:** Event Reporting
- **2. Number:** EOP-004-4
- **3. Purpose:** To improve the reliability of the Bulk Electric System by requiring the reporting of events by Responsible Entities.

### 4. Applicability:

- **4.1. Functional Entities:** For the purpose of the Requirements and the EOP-004 Attachment 1 contained herein, the following Functional Entities will be collectively referred to as "Responsible Entity."
  - 4.1.1. Reliability Coordinator
  - **4.1.2.** Balancing Authority
  - **4.1.3.** Transmission Owner
  - **4.1.4.** Transmission Operator
  - 4.1.5. Generator Owner
  - 4.1.6. Generator Operator
  - **4.1.7.** Distribution Provider
- 5. Effective Date: See the Implementation Plan for EOP-004-4.

### **B. Requirements and Measures**

- **R1.** Each Responsible Entity shall have an event reporting Operating Plan in accordance with EOP-004-4 Attachment 1 that includes the protocol(s) for reporting to the Electric Reliability Organization and other organizations (e.g., the Regional Entity, company personnel, the Responsible Entity's Reliability Coordinator, law enforcement, or governmental authority). [Violation Risk Factor: Lower] [Time Horizon: Operations Planning]
- M1. Each Responsible Entity will have a dated event reporting Operating Plan that includes protocol(s) and each organization identified to receive an event report for event types specified in EOP-004-4 Attachment 1 and in accordance with the entity responsible for reporting.

- **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). [Violation Risk Factor: Medium] [Time Horizon: Operations Assessment]
- **M2.** Each Responsible Entity will have as evidence of reporting an event either a copy of the completed EOP-004-4 Attachment 2 form or a DOE-OE-417 form; and some evidence of submittal (e.g., operator log or other operating documentation, voice recording, electronic mail message, or confirmation of facsimile) demonstrating that the event report was submitted 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).

### C. Compliance

### 1. Compliance Monitoring Process

### 1.1. Compliance Enforcement Authority:

"Compliance Enforcement Authority" means NERC or the Regional Entity, or any entity as otherwise designated by an Applicable Governmental Authority, in their respective roles of monitoring and/or enforcing compliance with mandatory and enforceable Reliability Standards in their respective jurisdictions.

#### **1.2.** Evidence Retention:

The Responsible Entity shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation:

The following evidence retention periods identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.

- Each Responsible Entity shall retain the current Operating Plan plus each version issued since the last audit for Requirement R1, and Measure M1.
- Each Responsible Entity shall retain evidence of compliance since the last audit for Requirement R2 and Measure M2.

If a Responsible Entity is found non-compliant, it shall keep information related to the non-compliance until mitigation is complete and approved or for the duration specified above, whichever is longer. The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records.

### 1.3. Compliance Monitoring and Enforcement Program

As defined in the NERC Rules of Procedure, "Compliance Monitoring and Enforcement Program" refers to the identification of the processes that will be used to evaluate data or information for the purpose of assessing performance or outcomes with the associated Reliability Standard.

# Violation Severity Levels

R #	Violation Severity Levels				
	Lower VSL	Moderate VSL	High VSL	Severe VSL	
R1.	The Responsible Entity had an event reporting Operating Plan, but failed to include one applicable event type.	The Responsible Entity had an event reporting Operating Plan, but failed to include two applicable event types.	The Responsible Entity had an event reporting Operating Plan, but failed to include three applicable event types.	The Responsible Entity had an event reporting Operating Plan, but failed to include four or more applicable event types. OR	
				The Responsible Entity failed to have an event reporting Operating Plan.	
R2.	The Responsible Entity submitted an event report (e.g., written or verbal) to all required recipients more than 24 hours but less than or equal to 36 hours after recognition of meeting an event threshold for reporting.	The Responsible Entity submitted an event report (e.g., written or verbal) to all required recipients more than 36 hours but less than or equal to 48 hours after recognition of meeting an event threshold for reporting.	The Responsible Entity submitted an event report (e.g., written or verbal) to all required recipients more than 48 hours but less than or equal to 60 hours after recognition of meeting an event threshold for reporting.	The Responsible Entity submitted an event report (e.g., written or verbal) to all required recipients more than 60 hours after recognition of meeting an event threshold for reporting.	
	OR The Responsible Entity failed to submit an event report	OR The Responsible Entity failed to submit an event report	OR The Responsible Entity failed to submit an event report	OR The Responsible Entity failed to submit an event report (e.g., written or verbal) to	
	(e.g., written or verbal) to one entity identified in its event reporting Operating	(e.g., written or verbal) to two entities identified in its event reporting Operating	(e.g., written or verbal) to three entities identified in its event reporting Operating	four or more entities identified in its event reporting Operating Plan	

R #	Violation Severity Levels				
	Lower VSL	Moderate VSL	High VSL	Severe VSL	
	Plan within 24 hours or by the end of the next business day, as applicable.	Plan within 24 hours or by the end of the next business day, as applicable.	Plan within 24 hours or by the end of the next business day, as applicable.	within 24 hours or by the end of the next business day, as applicable.	
				OR	
				The Responsible Entity failed to submit a report for an event in EOP-004 Attachment 1.	

# D. Regional Variances

None.

## **E. Associated Documents**

Link to the Implementation Plan and other important associated documents.

### EOP-004 - Attachment 1: Reportable Events

NOTE: Under certain adverse conditions (e.g. severe weather, multiple events) it may not be possible to report the damage caused by an event and issue a written Event Report within the timing in the standard. In such cases, the affected Responsible Entity shall notify parties per Requirement R2 and provide as much information as is available at the time of the notification. Submit reports to the ERO via one of the following: e-mail: <u>systemawareness@nerc.net</u>, Facsimile 404-446-9770 or Voice: 404-446-9780, select Option 1.

Submit EOP-004 Attachment 2 (or DOE-OE-417) pursuant to Requirements R1 and R2.

#### **Rationale for Attachment 1:**

System-wide voltage reduction 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.

Complete loss of Interpersonal Communication and Alternative Interpersonal Communication capability at a BES control center: To align EOP-004-4 with COM-001-2.1. COM-001-2.1 defined Interpersonal Communication for the NERC Glossary of Terms as: "Any medium that allows two or more individuals to interact, consult, or exchange information." The NERC Glossary of Terms defines 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."

Complete loss of monitoring or control capability at a BES control center: Language revisions to: "Complete loss of monitoring or control capability at a BES control center for 30 continuous minutes or more" provides clarity to the "Threshold for Reporting" and better aligns with the ERO Event Analysis Process.

Event Type	Entity with Reporting Responsibility	Threshold for Reporting
Damage or destruction of a Facility	RC, ВА, ТОР	Damage or destruction of a Facility within its Reliability Coordinator Area, Balancing Authority Area or Transmission Operator Area that results in action(s) to avoid a BES Emergency.

Event Type	Entity with Reporting Responsibility	Threshold for Reporting
Damage or destruction of its Facility	TO, TOP, GO, GOP, DP	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.
Physical threats to its Facility	TO, TOP, GO, GOP, DP	Physical threat to its Facility excluding weather or natural disaster related threats, which has the potential to degrade the normal operation of the Facility. OR Suspicious device or activity at its Facility.
Physical threats to its BES control center	RC, BA, TOP	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. OR Suspicious device or activity at its BES control center.
Public appeal for load reduction resulting from a BES Emergency	ВА	Public appeal for load reduction to maintain continuity of the BES.
System-wide voltage reduction	ТОР	System-wide voltage reduction of 3% or more to maintain the continuity of the BES.
Firm load shedding resulting from a BES Emergency	Initiating RC, BA, TOP	Firm load shedding ≥ 100 MW (manual or automatic).

Event Type	Entity with Reporting Responsibility	Threshold for Reporting	
BES Emergency resulting in voltage deviation on a Facility	ТОР	A voltage deviation of =/> ± 10% of nominal voltage sustained for ≥ 15 continuous minutes.	
Uncontrolled loss of firm load resulting from a BES Emergency	BA, TOP, DP	Uncontrolled loss of firm load for ≥ 15 Minutes from a single incident: ≥ 300 MW for entities with previous year's peak demand ≥ 3,000 MW OR ≥ 200 MW for all other entities	
System separation (islanding)	RC, ВА, ТОР	Each separation resulting in an island ≥ 100 MW	
Generation loss	ВА	<ul> <li>Total generation loss, within one minute, of:</li> <li>≥ 2,000 MW in the Eastern, Western, or Quebec Interconnection</li> <li>OR</li> <li>≥ 1,400 MW in the ERCOT Interconnection</li> <li>Generation loss will be used to report Forced Outages not weather patterns or fuel supply unavailability for dispersed power producing resources.</li> </ul>	

Event Type	Entity with Reporting Responsibility	Threshold for Reporting
Complete loss of off-site power to a nuclear generating plant (grid supply)	ΤΟ, ΤΟΡ	Complete loss of off-site power (LOOP) affecting a nuclear generating station per the Nuclear Plant Interface Requirement
Transmission loss	ТОР	Unexpected loss within its area, contrary to design, of three or more BES Facilities caused by a common disturbance (excluding successful automatic reclosing).
Unplanned evacuation of its BES control center	RC, BA, TOP	Unplanned evacuation from its BES control center facility for 30 continuous minutes or more.
Complete loss of Interpersonal Communication and Alternative Interpersonal Communication capability at its staffed BES control center	RC, BA, TOP	Complete loss of Interpersonal Communication and Alternative Interpersonal Communication capability affecting its staffed BES control center for 30 continuous minutes or more.
Complete loss of monitoring or control capability at its staffed BES control center	RC, BA, TOP	Complete loss of monitoring or control capability at its staffed BES control center for 30 continuous minutes or more.

# EOP-004 - Attachment 2: Event Reporting Form

### EOP-004 Attachment 2: Event Reporting Form

Use this form to report events. The Electric Reliability Organization will accept the DOE OE-417 form in lieu of this form if the entity is required to submit an OE-417 report. Submit reports to the ERO via one of the following: e-mail: <u>systemawareness@nerc.net</u>, Facsimile 404-446-9770 or voice: 404-446-9780, Option 1. Also submit to other applicable organizations per Requirement R1 "... (e.g., the Regional Entity, company personnel, the Responsible Entity's Reliability Coordinator, law enforcement, or Applicable Governmental Authority)."

	Task		Comments	
1.	Entity filing the report include:			
	Company name:			
	Name of contact person:			
	Email address of contact person:			
	Telephone Number:			
	Submitted by (name):			
2.	Date and Time of recognized event.			
2.	Date:(mm/dd/yyyy)			
	Time: (hh:mm)			
	Time/Zone:			
3.	Did the event originate in your system?	Yes 🗆	No□	Unknown 🛛
4.	Event Identifica	tion and I	Descript	ion:
	(Check applicable box)	Written	descrip	tion (optional):
	□ Damage or destruction of a Facility			
	PhysicalThreat to its Facility			
	$\Box$ Physical Threat to its BES control center			
	□ System-wide voltage reduction			
	BES Emergency:			
	□ firm load shedding			
	$\Box$ public appeal for load reduction			
	$\Box$ voltage deviation on a Facility			
	$\Box$ uncontrolled loss of firm load			

### EOP-004 Attachment 2: Event Reporting Form

Use this form to report events. The Electric Reliability Organization will accept the DOE OE-417 form in lieu of this form if the entity is required to submit an OE-417 report. Submit reports to the ERO via one of the following: e-mail: <u>systemawareness@nerc.net</u>, Facsimile 404-446-9770 or voice: 404-446-9780, Option 1. Also submit to other applicable organizations per Requirement R1 "... (e.g., the Regional Entity, company personnel, the Responsible Entity's Reliability Coordinator, law enforcement, or Applicable Governmental Authority)."

Task	Comments
□ System separation (islanding)	
Generation loss	
Complete loss of off-site power to a nuclear generating plant (grid supply)	
□ Transmission loss	
Unplanned evacuation of its BES control center	
<ul> <li>Complete loss of Interpersonal</li> <li>Communication and Alternative</li> <li>Interpersonal Communication capability</li> <li>at its staffed BES control center</li> </ul>	
Complete loss of monitoring or control capability at its staffed BES control center	

# **Version History**

Version	Date	Action	Change Tracking
2		Merged CIP-001-2a Sabotage Reporting and EOP-004-1 Disturbance Reporting into EOP- 004-2 Event Reporting; Retire CIP- 001-2a Sabotage Reporting and Retired EOP-004-1 Disturbance Reporting.	Revision to entire standard (Project 2009-01)
2	November 7, 2012	Adopted by the NERC Board of Trustees	
2	June 20, 2013	FERC approved	
3	November 13, 2014	Adopted by the NERC Board of Trustees	Replaced references to Special protection System and SPS with Remedial Action Scheme and RAS
3	November 19, 2015	FERC Order issued approving EOP- 004-3. Docket No. RM15-13-000.	

# **Guideline and Technical Basis**

### Multiple Reports for a Single Organization

For entities that have multiple registrations, the requirement is that these entities will only have to submit one report for any individual event. For example, if an entity is registered as a Reliability Coordinator, Balancing Authority and Transmission Operator, the entity would only submit one report for a particular event rather submitting three reports as each individual registered entity.

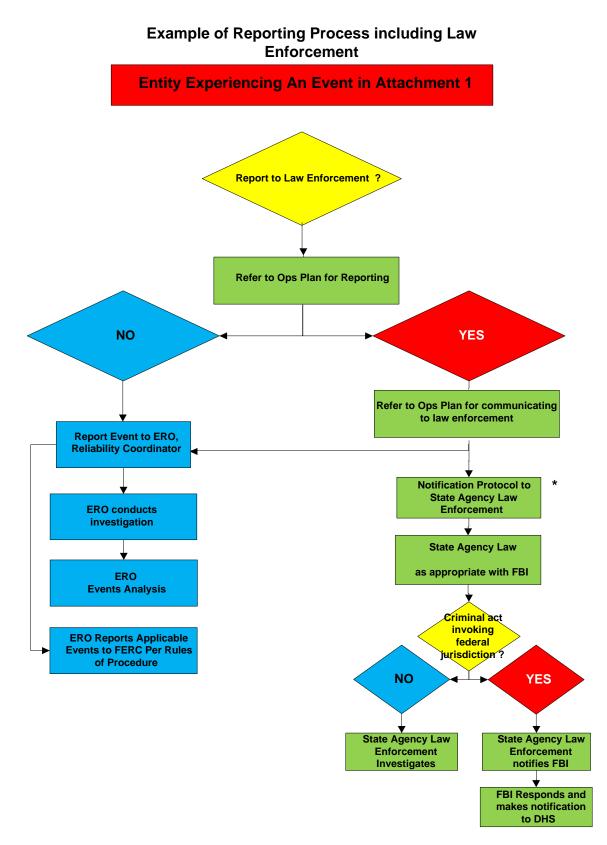
### Law Enforcement Reporting

The reliability objective of EOP-004-4 is to improve the reliability of the Bulk Electric System by requiring the reporting of events by Responsible Entities. Certain outages, such as those due to vandalism and terrorism, may not be reasonably preventable. These are the types of events that should be reported to law enforcement. Entities rely upon law enforcement agencies to respond to and investigate those events which have the potential to impact a wider area of the BES. The inclusion of reporting to law enforcement enables and supports reliability principles such as protection of Bulk Electric System from malicious physical attack. The importance of BES awareness of the threat around them is essential to the effective operation and planning to mitigate the potential risk to the BES.

### **Stakeholders in the Reporting Process**

- Industry
- NERC (ERO), Regional Entity
- FERC
- DOE
- NRC
- DHS Federal
- Homeland Security- State
- State Regulators
- Local Law Enforcement
- State or Provincial Law Enforcement
- FBI
- Royal Canadian Mounted Police (RCMP)

The above stakeholders have an interest in the timely notification, communication and response to an incident at a Facility. The stakeholders have various levels of accountability and have a vested interest in the protection and response to ensure the reliability of the BES.



Canadian entities will follow law enforcement protocols applicable in their jurisdictions

### Potential Uses of Reportable Information

General situational awareness, correlation of data, trend identification, and identification of potential events of interest for further analysis in the ERO Event Analysis Process are a few potential uses for the information reported under this standard. The standard requires Functional Entities to report the incidents and provide information known at the time of the report. Further data gathering necessary for analysis is provided for under the ERO Event Analysis Program and the NERC Rules of Procedure. The <u>NERC Rules of Procedure (section 800)</u> provide an overview of the responsibilities of the ERO in regards to analysis and dissemination of information for reliability. Jurisdictional agencies (which may include DHS, FBI, NERC, RE, FERC, Provincial Regulators, and DOE) have other duties and responsibilities.

## Rationale

During development of this standard, text boxes were embedded within the standard to explain the rationale for various parts of the standard. Upon BOT adoption, the text from the rationale text boxes was moved to this section.