

# Survey Report

## Survey Details

**Name** 2015-02 EOP Periodic Review | EOP-006-2

**Description**

**Start Date** 3/27/2015

**End Date** 5/11/2015

**Associated Ballots**

## Survey Questions

**See the Unofficial Comment Forms on the [Project Page](#) for additional background information.**

***If you would like to bypass taking the survey, scroll down to submit.***

***This will allow you to view Social Survey and agree/disagree with an already posted comment using the***

**"thumbs up/thumbs down" feature.**

***I want to bypass taking the survey***

***1. The EOP PRT's initial recommendation outlines three (3) clarifying revisions to EOP-006-2. Do you agree with the EOP PRT's recommended revisions? If not, please explain specifically what aspects of the recommendation you disagree with.***

**Yes**

**No**

***2. The EOP PRT is proposing not to retire three (3) requirements in EOP-006-2 per the Paragraph 81 criteria and has provided justification for not retiring the requirements that the IERP recommended retiring. Do you agree with the EOP PRT's recommendations? If not, please explain.***

**Yes**

**No**

***3. The EOP PRT does propose retiring one (1) requirement and four (4) Requirement Parts in EOP-006-2. Do you agree with the EOP PRT's recommendations? If not, please explain.***

**Yes**

**No**

**4. Do you agree with the initial recommendation of the EOP PRT regarding EOP-006-2? If not, please explain specifically what aspects of the recommendation you disagree with.**

**Yes**

**No**

**5. If you have any other comments that you have not already mentioned above, on the Periodic Review recommendation, please state it specifically for EOP-006-2.**

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## Responses By Question

See the *Unofficial Comment Forms* on the [Project Page](#) for additional background information.

**Dennis Minton - Florida Keys Electric Cooperative Assoc. - 1 -**

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

**Dislikes:** 0

---

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Leonard Kula - Independent Electricity System Operator - 2 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Si Truc Phan - Hydro-Qu?bec TransEnergie - 1 - NPCC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO**

Error: Subreport could not be shown.

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Kaleb Brimhall - Colorado Springs Utilities - 5 -**

Error: Subreport could not be shown.

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Connie Lowe - Dominion - Dominion Resources, Inc. - 3 -**

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**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Brian Bartos - CPS Energy - 3 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Joel Wise - Tennessee Valley Authority - 1,3,5,6 - SERC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Nick Vtyurin - Manitoba Hydro - 1,3,5,6 - MRO**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Andrew Pusztai - American Transmission Company, LLC - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**



**Likes:** 0

**Dislikes:** 0

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**Molly Devine - IDACORP - Idaho Power Company - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Lee Pedowicz - NPCC - 10 - NPCC**

Error: Subreport could not be shown.

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**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Mark Kenny - Northeast Utilities - 3 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Ben Engelby - ACES Power Marketing - 6 -**

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**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Kathleen Black - DTE Energy - 3,4,5 - RFC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Jason Smith - Southwest Power Pool, Inc. (RTO) - 2 - SPP**

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**Jared Shakespeare - Peak Reliability - 1 -**

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**Likes:** 0

**Dislikes:** 0

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**Rachel Coyne - Texas Reliability Entity, Inc. - 10 -**

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**Dislikes:** 0

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**Ben Li - Independent Electricity System Operator - 2 - NPCC**

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**Likes:** 0

**Dislikes:** 0

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**RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 - SERC**

Selected Answer:

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**Likes:** 0

**Dislikes:** 0

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**Sergio Banuelos - Tri-State G and T Association, Inc. - 1,3,5 - MRO,WECC**

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**Dislikes:** 0

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**Leo Staples - OGE Energy - Oklahoma Gas and Electric Co. - 5 -**

Selected Answer:

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**Likes:** 0

**Dislikes:** 0

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**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**minh pham - Los Angeles Department of Water and Power - NA - Not Applicable - WECC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Joshua Andersen - Salt River Project - 1,3,5,6 - WECC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Daniela Hammons - CenterPoint Energy Houston Electric, LLC - 1 - TRE**

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**Si Truc Phan - Hydro-Qu?bec TransEnergie - 1 - NPCC**

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**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO**

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**Dislikes:** 0

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**Connie Lowe - Dominion - Dominion Resources, Inc. - 3 -**

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**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Brian Bartos - CPS Energy - 3 -**

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**Document Name:**

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**Dislikes:** 0

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**Joel Wise - Tennessee Valley Authority - 1,3,5,6 - SERC**

Selected Answer: I want to bypass taking the survey

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**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Nick Vtyurin - Manitoba Hydro - 1,3,5,6 - MRO**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -**

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**Dislikes:** 0

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**Likes:** 0

**Dislikes:** 0

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**Molly Devine - IDACORP - Idaho Power Company - 1 -**

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**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Lee Pedowicz - NPCC - 10 - NPCC**

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**Mark Kenny - Northeast Utilities - 3 -**

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**Ben Engelby - ACES Power Marketing - 6 -**

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**Kathleen Black - DTE Energy - 3,4,5 - RFC**

Selected Answer:

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**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Jason Smith - Southwest Power Pool, Inc. (RTO) - 2 - SPP**

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**Answer Comment:**

**Document Name:**

**Likes:** 0



**Dislikes:** 0

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**Jared Shakespeare - Peak Reliability - 1 -**

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**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Rachel Coyne - Texas Reliability Entity, Inc. - 10 -**

Selected Answer:

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**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Ben Li - Independent Electricity System Operator - 2 - NPCC**

Error: Subreport could not be shown.

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**Likes:** 0

**Dislikes:** 0

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**RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 - SERC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Sergio Banuelos - Tri-State G and T Association, Inc. - 1,3,5 - MRO,WECC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Leo Staples - OGE Energy - Oklahoma Gas and Electric Co. - 5 -**

Selected Answer: I want to bypass taking the survey

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**minh pham - Los Angeles Department of Water and Power - NA - Not Applicable - WECC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Joshua Andersen - Salt River Project - 1,3,5,6 - WECC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Daniela Hammons - CenterPoint Energy Houston Electric, LLC - 1 - TRE**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

***1. The EOP PRT's initial recommendation outlines three (3) clarifying revisions to EOP-006-2. Do you agree with the EOP PRT's recommended revisions? If not, please explain specifically what aspects of the recommendation you disagree with.***

**Dennis Minton - Florida Keys Electric Cooperative Assoc. - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Leonard Kula - Independent Electricity System Operator - 2 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Si Truc Phan - Hydro-Qu?bec TransEnergie - 1 - NPCC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO**

Error: Subreport could not be shown.

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Kaleb Brimhall - Colorado Springs Utilities - 5 -**

Error: Subreport could not be shown.

Selected Answer: No

**Answer Comment:**

CSU agrees with the recommendations of the IERP for retirement of requirements. All requirements that the IERP recommended retiring need to be retired.

**Document Name:**

Likes: 0

Dislikes: 0

---

**Connie Lowe - Dominion - Dominion Resources, Inc. - 3 -**

Error: Subreport could not be shown.

Selected Answer: Yes

**Answer Comment:**

**Document Name:**



**Likes:** 0

**Dislikes:** 0

---

**Brian Bartos - CPS Energy - 3 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Joel Wise - Tennessee Valley Authority - 1,3,5,6 - SERC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Nick Vtyurin - Manitoba Hydro - 1,3,5,6 - MRO**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Andrew Pusztai - American Transmission Company, LLC - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Molly Devine - IDACORP - Idaho Power Company - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Lee Pedowicz - NPCC - 10 - NPCC**

Error: Subreport could not be shown.

Selected Answer: No

**Answer Comment:**

Regarding Item a. on page 4--Suggest revising Part R1.5 to read:

R1.5 Criteria and conditions for reestablishing interconnections between Transmission Operators within its Reliability Coordinator Area, with adjacent electrically interconnected Transmission Operators in other Reliability Coordinator Areas, and with electrically adjacent Reliability Coordinators.

Item b.--Agree.

Item c.--Agree.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Mark Kenny - Northeast Utilities - 3 -**

Selected Answer: No

**Answer Comment:**

Regarding Item a.--Suggest revising Part R1.5 to read:

R1.5 Criteria and conditions for reestablishing interconnections between Transmission Operators within its Reliability Coordinator Area, with adjacent electrically interconnected Transmission Operators in other Reliability Coordinator Areas, and with electrically adjacent Reliability Coordinators.

Item b.--Agree.

Item c.--Agree.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Ben Engelby - ACES Power Marketing - 6 -**

Error: Subreport could not be shown.

**Selected Answer:** No

**Answer Comment:**

We disagree with the PRT's recommendation to modify the requirements by adding "develop, maintain, and implement" instead of retiring requirements that meet Paragraph 81 criteria. This additional language will only complicate registered entities' compliance programs, when the simple solution is to retire the administrative requirements.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Kathleen Black - DTE Energy - 3,4,5 - RFC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Jason Smith - Southwest Power Pool, Inc. (RTO) - 2 - SPP**

Error: Subreport could not be shown.

Selected Answer: No

**Answer Comment:**

We disagree with revising R8 to include other aspects of the RC implementing their plan. The RC's role in the plan is to simply coordinate and direct actions. So the language in R8 is appropriate in that it clearly specifies the RC's additional role which is to review and approve interconnections of TOP areas or islands as appropriate.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Jared Shakespeare - Peak Reliability - 1 -**

**Selected Answer:** No

**Answer Comment:**

**R1.2, R1.3 and R1.4:** Agree with the PRT comments to retire R1.2, R1.3 and R1.4 as they are covered (loosely) by R1.5.

**R1.5:** agree with adding the term “adjacent” to identify which TOPs and RCs the requirement refers to.

**R7:** We are hesitant to agree with the PRT on broadening the language of the requirement. What is the reason behind removing the phrase ‘work with its affected GOPs and TOPs to monitor restoration progress, coordinate restoration and take actions to restore the BE frequency within acceptable limits?’

**R7 and R8:** It is unclear where the PRT expects the words ‘develop, maintain and implement’ to fit in the requirement.

**R10.1:** Add ‘blackstart’ before the term Generator Operator so that the RC only need to formally request blackstart GOPs during its restoration training drills.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Rachel Coyne - Texas Reliability Entity, Inc. - 10 -**

Selected Answer: No

**Answer Comment:**

Texas RE does not agree with the retirement of Requirement R9. See number three.

Texas RE recommends consistent use of the terms "adjacent" and "neighboring" (R1.5, R1.8, and R2). The terms "Adjacent" and "neighboring" do not imply synchronous which has been a discussion point in the past with Entities that have DC Ties. In the Texas RE/ERCOT Interconnection, restoration could include use of DC Ties.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Ben Li - Independent Electricity System Operator - 2 - NPCC**

Error: Subreport could not be shown.

Selected Answer: Yes



**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 - SERC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Sergio Banuelos - Tri-State G and T Association, Inc. - 1,3,5 - MRO,WECC**

Selected Answer: No

**Answer Comment:**

Tri-State doesn't believe that R1.9 is an unnecessary action. TOPs have the authority to balance resources during a restoration event, and there should be some acknowledgement of how to accomplish the transfer of

balancing back to the BA function

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Leo Staples - OGE Energy - Oklahoma Gas and Electric Co. - 5 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**minh pham - Los Angeles Department of Water and Power - NA - Not Applicable - WECC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Joshua Andersen - Salt River Project - 1,3,5,6 - WECC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Daniela Hammons - CenterPoint Energy Houston Electric, LLC - 1 - TRE**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

Likes: 0

Dislikes: 0

***2. The EOP PRT is proposing not to retire three (3) requirements in EOP-006-2 per the Paragraph 81 criteria and has provided justification for not retiring the requirements that the IERP recommended retiring. Do you agree with the EOP PRT's recommendations? If not, please explain.***

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Selected Answer:

**Answer Comment:**

**Document Name:**

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**Dislikes:** 0

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**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Leonard Kula - Independent Electricity System Operator - 2 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Si Truc Phan - Hydro-Qu?bec TransEnergie - 1 - NPCC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO**

Error: Subreport could not be shown.

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Kaleb Brimhall - Colorado Springs Utilities - 5 -**

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Selected Answer: No

**Answer Comment:**

CSU agrees with the recommendations of the IERP for retirement of these requirements. These requirements need to be retired

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Likes: 0

Dislikes: 0

---

**Connie Lowe - Dominion - Dominion Resources, Inc. - 3 -**

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Selected Answer: Yes

**Answer Comment:**

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Likes: 0

**Dislikes:** 0

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**Brian Bartos - CPS Energy - 3 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Joel Wise - Tennessee Valley Authority - 1,3,5,6 - SERC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---



**Nick Vtyurin - Manitoba Hydro - 1,3,5,6 - MRO**

Selected Answer: No

**Answer Comment:**

I agree with IERP recommendations and reasons. Revise for consistency by using the already-approved industry terminology, "Develop, maintain and implement"

**Document Name:**

Likes: 0

Dislikes: 0

---

**christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -**

Selected Answer: No

**Answer Comment:**

ERCOT agrees with the review team that Requirement R10 should not be retired. Please refer to ERCOT's comments in response to the review of EOP-005-2 as well as its response to Question 3 below for additional details. For the same reasons, ERCOT does not support the review team's recommendation to retire Requirement R9.

**Document Name:**

Likes: 0

**Dislikes:** 0

---

**Andrew Pusztai - American Transmission Company, LLC - 1 -**

Selected Answer: No

**Answer Comment:**

**ATC believes EOP-006-2 R10 should be retired as recommended by the IERP. Requirement R10 is not about testing the plan but drilling the personnel on execution of the plan, therefore, is a training item as the IERP identified and should be captured in PER-005-1**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Molly Devine - IDACORP - Idaho Power Company - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:**

0

---

**Lee Pedowicz - NPCC - 10 - NPCC**

Error: Subreport could not be shown.

Selected Answer:

No

**Answer Comment:**

Requirement R8 can be retired. Resynchronization is inherent in any restoration plan.

Agree that Requirement R10 should not be retired.

Recommend that Requirements R7 and R8 be incorporated into Requirement R1. The already-approved industry terminology "develop, maintain and implement" should be incorporated into EOP-005-2. By adding that terminology in Requirement R1, the language of Requirements R7 and R8 can be moved to Requirement R1. This is consistent with the structure of other reliability standards [e.g., EOP-001-2.1b R2 (and future successor EOP-011-1, Requirements R1 and R2), EOP-010-1 Requirements R1 and R3 and TOP-004-2 Requirement R6]. Therefore, recommend retiring Requirements R7 and R8, and moving the language of Requirements R7 and R8 into Requirement R1. Specifically, Requirement R1 should be revised as follows:

- The first sentence in Requirement R1 should be revised to state: "Each Reliability Coordinator shall develop, maintain and implement a Reliability Coordinator Area restoration plan."

- Part R1.2 should be revised to address elements of Requirement R7 (which then allows Requirement R7 to be retired):  
"Operating Processes for restoring the interconnection that address working with its affected Generator Operators and Transmission Operators as well as neighboring Reliability Coordinators, to monitor restoration progress, coordinate restoration and take actions to

restore the BES frequency within acceptable limits."

. The EOP PRT recommended a modest revision to Part R1.5 (adding the work "adjacent"). While we agree with the concept of the suggested change to Part R1.5, suggest a more extensive revision that addresses both the concept of the change recommended by the EOP PRT and that also addresses elements of Requirement R8 (which then allows Requirement R8 to be retired): "Criteria and conditions for the Reliability Coordinator to authorize and coordinate the resynchronizing of all islanded areas that bridge boundaries between Transmission Operators within its Reliability Coordinator Area, and between its Reliability Coordinator Area and Transmission Operators and Reliability Coordinators in adjacent Reliability Coordinator Areas."

. A new part should be added to R1 (best to be placed as Part R1.9, with the currently effective Part R1.9 renumbered to become Part R1.10). The new part should state: "Restoration strategies to facilitate restoration, including resynchronizations, if the restoration plan cannot be executed as expected."

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Mark Kenny - Northeast Utilities - 3 -**

Selected Answer: No

**Answer Comment:**

Requirement R8 can be retired. Resynchronization is inherent in any restoration plan.

Agree that Requirement R10 should not be retired.

Recommend that Requirements R7 and R8 be incorporated into Requirement R1. The already-approved industry terminology “develop, maintain and implement” should be incorporated into EOP-005-2. By adding that terminology in Requirement R1, the language of Requirements R7 and R8 can be moved to Requirement R1. This is consistent with the structure of other reliability standards [e.g., EOP-001-2.1b R2 (and future successor EOP-011-1, Requirements R1 and R2), EOP-010-1 Requirements R1 and R3 and TOP-004-2 Requirement R6]. Therefore, recommend retiring Requirements R7 and R8, and moving the language of Requirements R7 and R8 into Requirement R1. Specifically, Requirement R1 should be revised as follows:

- The first sentence in Requirement R1 should be revised to state: "Each Reliability Coordinator shall develop, maintain and implement a Reliability Coordinator Area restoration plan."
- Part R1.2 should be revised to address elements of Requirement R7 (which then allows Requirement R7 to be retired): "Operating Processes for restoring the interconnection that address working with its affected Generator Operators and Transmission Operators as well as neighboring Reliability Coordinators, to monitor restoration progress, coordinate restoration and take actions to restore the BES frequency within acceptable limits."
- The EOP PRT recommended a modest revision to Part 1.5 (adding the work “adjacent”). While we agree with the concept of the suggested change to Part R1.5, suggest a more extensive revision that addresses both the concept of the change recommended by the EOP PRT and that also addresses elements of Requirement R8 (which then allows Requirement R8 to be retired): "Criteria and conditions for the Reliability Coordinator to authorize and coordinate the resynchronizing of all islanded areas that bridge boundaries between Transmission Operators within its Reliability Coordinator Area, and between its Reliability

Coordinator Area and Transmission Operators and Reliability Coordinators in other adjacent Reliability Coordinator Areas."

- A new part should be added to R1 (best to be placed as Part 1.9, with the currently effective Part R1.9 renumbered to become Part 1.10). The new part should state: "Restoration strategies to facilitate restoration, including resynchronizations, if the restoration plan cannot be executed as expected."

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Ben Engelby - ACES Power Marketing - 6 -**

Error: Subreport could not be shown.

**Selected Answer:** No

**Answer Comment:**

(1) We disagree with the PRT's recommendation to modify the requirements that have already been identified as meeting Paragraph 81 criteria. These requirements should be retired, not modified.

(2) We disagree with the review team's interpretation that R10 is a testing requirement. The requirement is focused on training. Ensuring staff capabilities for carrying out the restoration plan is duplicative with PER-005-2 R3.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Kathleen Black - DTE Energy - 3,4,5 - RFC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Jason Smith - Southwest Power Pool, Inc. (RTO) - 2 - SPP**

Error: Subreport could not be shown.

Selected Answer: No

**Answer Comment:**

We disagree with the PRT's recommendation that R10's intent is for testing. The very definition of drill seems to indicate a training intent. We recommend that if the PRT and future SDT perceive that R10 is related to

testing that the wording of the requirement be changed to reflect that and be clear. Also, if the intent is testing, the requirement should clearly dictate what is to be tested and what results of testing are intended to be maintained.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Jared Shakespeare - Peak Reliability - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Rachel Coyne - Texas Reliability Entity, Inc. - 10 -**

Selected Answer: Yes

**Answer Comment:**



**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Ben Li - Independent Electricity System Operator - 2 - NPCC**

Error: Subreport could not be shown.

**Selected Answer:** Yes

**Answer Comment:**

**We agree that Requirement R10 should not be retired.**

**We recommend that Requirements R7 and R8 be incorporated into Requirement R1. We agree that the already-approved industry terminology “develop, maintain and implement” should be incorporated into EOP-005-2. By adding that terminology in Requirement R1, the language of Requirements R7 and R8 can be moved to Requirement R1. This is consistent with the structure of other reliability standards [e.g., EOP-001-2.1b R2 (and future successor EOP-011-1, Requirements R1 and R2), EOP-010-1 Requirements R1 and R3 and TOP-004-2 Requirement R6]. Therefore, we recommend retiring Requirements R7 and R8, and moving the language of Requirements R7 and R8 into Requirement R1. Specifically, Requirement R1 should be revised as follows:**

**· The first sentence in Requirement R1 should be revised to state: "Each Reliability Coordinator shall develop, maintain and**

implement a Reliability Coordinator Area restoration plan."

- Part R1.2 should be revised to address elements of Requirement R7 (which then allows Requirement R7 to be retired): "Operating Processes for restoring the interconnection that address working with its affected Generator Operators and Transmission Operators as well as neighboring Reliability Coordinators, to monitor restoration progress, coordinate restoration and take actions to restore the BES frequency within acceptable limits."

- The EOP PRT recommended a modest revision to Part 1.5 (adding the work "adjacent"). While we agree with the concept of the suggested change to Part R1.5, we suggest a more extensive revision that addresses both the concept of the change recommended by the EOP PRT and that also addresses elements of Requirement R8 (which then allows Requirement R8 to be retired): "Criteria and conditions for the Reliability Coordinator to authorize and coordinate the resynchronizing of all islanded areas that bridge boundaries between Transmission Operators within its Reliability Coordinator Area, and between its Reliability Coordinator Area and Transmission Operators and Reliability Coordinators in adjacent Reliability Coordinator Areas."

A new part should be added to R1 (best placed as Part 1.9, with the currently effective Part R1.9 renumbered to become Part 1.10). The new part should state: "Restoration strategies to facilitate restoration, including resynchronizations, if the restoration plan cannot be executed as expected."

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 - SERC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Sergio Banuelos - Tri-State G and T Association, Inc. - 1,3,5 - MRO,WECC**

Selected Answer: No

**Answer Comment:**

Tri-State believes the recommendations for requirements R7 and R8 would make them duplicative requirements. We support the PRT recommendation for keeping R10.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Leo Staples - OGE Energy - Oklahoma Gas and Electric Co. - 5 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

Selected Answer: Yes

**Answer Comment:**

BPA disagrees with the PRT recommendation for changing R8 language;  
R8 language is measureable as is.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**minh pham - Los Angeles Department of Water and Power - NA - Not Applicable - WECC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Joshua Andersen - Salt River Project - 1,3,5,6 - WECC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Daniela Hammons - CenterPoint Energy Houston Electric, LLC - 1 - TRE**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**3. The EOP PRT does propose retiring one (1) requirement and four (4) Requirement Parts in EOP-006-2. Do you agree with the EOP PRT's recommendations? If not, please explain.**

**Dennis Minton - Florida Keys Electric Cooperative Assoc. - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Leonard Kula - Independent Electricity System Operator - 2 -**

**Selected Answer:** No

**Answer Comment:**

**We agree with the proposed retirement of Parts R1.2, R1.3 and R1.4, but do not agree with retiring Requirement R9 (which mirrors R10 in EOP-005-2) as we do not believe this requirement is duplicative of any requirements in PER-005-2.**

**Similar to our comments on the proposed retirement of R10 in EOP-005-2, we assess that the Independent Expert Panel's recommendation to retire R9 in EOP-006-2 was based on its assessment that this requirement was duplicative of R3 in PER-005-1, which stipulates that:**

**R3. At least every 12 months each Reliability Coordinator, Balancing Authority and Transmission**

**Operator shall provide each of its System Operators with at least 32 hours of emergency operations training applicable to its organization that reflects emergency operations topics, which includes system restoration using drills, exercises or other training required to maintain qualified personnel.**

**The recommendation to retire R9 of EOP-006-2 appeared to be**

appropriate at that time. However, in PER-005-2 (revised from PER-005-1), the requirement to provide system restoration training to RC operating personnel no longer exists. In fact, the rationale to remove the minimum training requirement specific to system restoration from PER-005-1 was in part based on the existence of Requirement R10 in EOP-005-1, and R9 in EOP-006-2

If Requirement R9 in EOP-006-2 is removed, then there will not be any requirement to provide system restoration training to operating personnel. We therefore suggest that this requirement be retained.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Si Truc Phan - Hydro-Quebec TransEnergie - 1 - NPCC**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO**

Error: Subreport could not be shown.

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Kaleb Brimhall - Colorado Springs Utilities - 5 -**

Error: Subreport could not be shown.

Selected Answer: Yes

**Answer Comment:**

Yes this should be retired.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Connie Lowe - Dominion - Dominion Resources, Inc. - 3 -**

Error: Subreport could not be shown.

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Brian Bartos - CPS Energy - 3 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Joel Wise - Tennessee Valley Authority - 1,3,5,6 - SERC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Nick Vtyurin - Manitoba Hydro - 1,3,5,6 - MRO**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -**

Selected Answer: No

**Answer Comment:**

ERCOT agrees with the proposed retirement of Parts R1.3 and R1.4, but does not agree with retiring part 1.2 or Requirement R9 (which mirrors R10 in EOP-005-2) as it does not believe this requirement is duplicative. Similar to ERCOT's comments on the proposed retirement of R10 in EOP-005-2, ERCOT assesses that the Independent Expert Panel's recommendation to retire R9 in EOP-006-2 was based on reliability standard PER-005-1, which has been revised. The successor standard, PER-005-2, removed the requirement to provide system restoration training to RC operating personnel. If Requirement R9 in EOP-006-2 is removed, then there will not be any requirement to provide system restoration training to operating personnel. ERCOT, therefore, suggests that this requirement be retained.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Andrew Pusztai - American Transmission Company, LLC - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Molly Devine - IDACORP - Idaho Power Company - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Lee Pedowicz - NPCC - 10 - NPCC**

Error: Subreport could not be shown.

Selected Answer: No

**Answer Comment:**

Agree with the retirement of the requirement and the THREE requirement Parts listed on page 3. Agree with the retirement of requirement R9, however, as posted on the NERC website, PER-005-2 has yet to be filed with the regulatory authorities.

Agree that Requirement R9, as well as Requirement 1, Parts R1.3 and R1.4 should be retired. [Note: the EOP PRT proposed to retire only three Requirement Parts (R1.2, R1.3, and R1.4), not four as stated in this question]. However, as described above, suggest that Requirement R1 Part 1.2 be retained and revised to capture Requirement R7 (which would be retired). Additionally, after revising Requirement 1, Part 1.5 as

described above, Requirement R8 can also be retired.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Mark Kenny - Northeast Utilities - 3 -**

**Selected Answer:** No

**Answer Comment:**

Agree that Requirement R9, as well as Requirement 1, Parts R1.3 and R1.4 should be retired. [Note: the EOP PRT proposed to retire only three Requirement Parts (R1.2, R1.3, and R1.4), not four as stated in this question]. However, as described above, suggests that Requirement R1 Part 1.2 be retained and revised to capture Requirement R7 (which would be retired). Additionally, after revising Requirement 1, Part 1.5 as described above, Requirement R8 can also be retired.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Ben Engelby - ACES Power Marketing - 6 -**

Error: Subreport could not be shown.

Selected Answer: Yes

**Answer Comment:**

We agree that requirements which meet Paragraph 81 criteria should be retired. As stated in an earlier question, we feel that there are several requirements, not just one requirement, that meet Paragraph 81 and all of these requirements should be retired.

**Document Name:**

Likes: 0

Dislikes: 0

---

**Kathleen Black - DTE Energy - 3,4,5 - RFC**

Selected Answer: Yes

**Answer Comment:**

Correction to question #3 wording-The EOP PRT does not propose retiring one (1) requirement and Three (3) requirement parts in EOP-006-2.

**Document Name:**

Likes: 0

**Dislikes:** 0

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**Jason Smith - Southwest Power Pool, Inc. (RTO) - 2 - SPP**

Error: Subreport could not be shown.

**Selected Answer:** No

**Answer Comment:**

We disagree with the removal of R1.9 as we do not agree that it is an unnecessary action. During a restoration, depending on configuration, the BA may be “whole” but neighbors may not be fully interconnected with other entities. Therefore the interchange between those areas may need to be coordinated with the RC. In essence the BA's role and authority is suspended and is overlapped with the RC's role during restoration. When the event has reached the criteria as outlined in the RC plan where authority can be transferred back to the BA, then the BA can take balancing actions without coordinating those with the RC. This also leads us to disagree with the proposed changes to R7. The RC will be helping balance frequency through coordination with TOPs and GOPs during restoration. This role is not described in any other requirement and will be lost if the proposed changes are made.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Jared Shakespeare - Peak Reliability - 1 -**



Selected Answer: No

**Answer Comment:**

**R9:** We absolutely disagree with the PRT on retiring R9. It is not uniquely covered under proposed PER-005-2. System restoration is a very low probability high risk scenario with tremendous implications to the BES. As such, specific training is necessary to be identified. There is no requirement within proposed PER-005-2 to annually train on restoration.

**Document Name:**

Likes: 0

Dislikes: 0

---

**Rachel Coyne - Texas Reliability Entity, Inc. - 10 -**

Selected Answer:

**Answer Comment:**

Texas RE does not agree with the retirement of R1.2, R1.3, and R1.4. "Criteria and conditions..." in R1.5 is not the same as "A description of the high level strategy to be employed during restoration events for restoring the Interconnection" in R1.1 nor is it the same as "Operating Processes for restoring the Interconnection" in R1.2.

Texas RE does not agree with retiring Requirement R9. Requirement R9 specifically requires training for Blackstart and other system-restoration processes. The EOP PRT suggests that these duties are covered by the upcoming PER-005-2 Standard. While the PER-005-2 standard does require that personnel be trained for normal/emergency operations of the BES, PER-005-2 does not require any specific type of training in regards

to Blackstart/system-restoration. This is problematic because the PER-005-2 standard does not directly replace EOP-006-2 R9, and leaves potential gaps when determining compliance. Registered Entities could be allowed to forgo Blackstart training, while still being compliant with PER-005-2. The requirement to perform Blackstart training will be lost if EOP-006-2, R9 is retired.

Texas RE is concerned that gaps in training could occur since entities would not have to specifically comply with the sub requirements of R9, which are necessary to understand if system restoration is needed. If a company does not consider the R9 items as “BES company-specific Real-time reliability-related tasks” per PER-005-2, compliance may be met but reliability would suffer.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Ben Li - Independent Electricity System Operator - 2 - NPCC**

Error: Subreport could not be shown.

**Selected Answer:** No

**Answer Comment:**

**We agree with the proposed retirement of Parts R1.2, R1.3 and R1.4. [Note: the EOP PRT proposed to retire only three Requirement Parts (R1.2, R1.3, and R1.4), not four as stated in this question]. However, as described above, we suggest that Requirement R1 Part 1.2 be retained and revised to capture Requirement R7 (which would be retired).**

**In addition, after revising Requirement 1, Part 1.5 as described above, Requirement R8 can also be retired.**

**Wrt other requirements, we do not agree with retiring Requirement R9 (which mirrors R10 in EOP-005-2) as we do not believe this requirement is duplicative of any requirements in PER-005-2.**

**Similar to our comments on the proposed retirement of R10 in EOP-005-2, we assess that the Independent Expert Panel's recommendation to retire R9 in EOP-006-2 was based on its assessment that this requirement was duplicative of R3 in PER-005-1, which stipulates that:**

**R3. At least every 12 months each Reliability Coordinator, Balancing Authority and Transmission**

**Operator shall provide each of its System Operators with at least 32 hours of emergency operations training applicable to its organization that reflects emergency operations topics, which includes system restoration using drills, exercises or other training required to maintain qualified personnel.**

**The recommendation to retire R9 of EOP-006-2 appeared to be appropriate at that time. However, in PER-005-2 (revised from PER-005-1), the requirement to provide system restoration training to RC operating personnel no longer exists. In fact, the rationale to remove the minimum training requirement specific to system restoration from PER-005-1 was in part based on the existence of Requirement R10 in EOP-005-1, and R9 in EOP-006-2**

**If Requirement R9 in EOP-006-2 is removed, then there will not be any requirement to provide system restoration training to operating personnel. We therefore suggest that this requirement be retained.**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 - SERC**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Sergio Banuelos - Tri-State G and T Association, Inc. - 1,3,5 - MRO,WECC**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Leo Staples - OGE Energy - Oklahoma Gas and Electric Co. - 5 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**minh pham - Los Angeles Department of Water and Power - NA - Not Applicable - WECC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Joshua Andersen - Salt River Project - 1,3,5,6 - WECC**

Selected Answer: No

**Answer Comment:**

SRP does not see R1.2, R1.3 and R1.4 as being duplicative of R1.5. For instance, specific Operating Processes are required under R1.2 whereas, that is not specifically addressed in R1.5 and may be omitted if R1.2 is retired.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Daniela Hammons - CenterPoint Energy Houston Electric, LLC - 1 - TRE**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

***4. Do you agree with the initial recommendation of the EOP PRT regarding EOP-006-2? If not, please explain specifically what aspects of the recommendation you disagree with.***

**Dennis Minton - Florida Keys Electric Cooperative Assoc. - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**John Fontenot - Bryan Texas Utilities - 1 -**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Leonard Kula - Independent Electricity System Operator - 2 -**

**Selected Answer:** Yes

**Answer Comment:**

**We generally agree with the proposed revisions except the proposed retirement of Requirement R9 as noted under Q2, above.**

**Document Name:**



**Likes:** 0

**Dislikes:** 0

---

**Si Truc Phan - Hydro-Qu?bec TransEnergie - 1 - NPCC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO**

Error: Subreport could not be shown.

Selected Answer: Yes

**Answer Comment:**

The NSRF is recommending the follow change: Page 3, second bulleted item, *IERP: Requirement R8* states "Develop, maintain and implement" (similar to the proposed EOP-011-1) so that all pertinent aspects of the plan are implemented...". The NSRF would like to state that an established plan may not fit all real-time situations. The EOP PRT should

make this clear, even though the terms "pertinent aspects" is used.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Kaleb Brimhall - Colorado Springs Utilities - 5 -**

Error: Subreport could not be shown.

**Selected Answer:** No

**Answer Comment:**

CSU agrees with the recommendations of the IERP for retirement of requirements. All requirements that the IERP recommended retiring need to be retired.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Connie Lowe - Dominion - Dominion Resources, Inc. - 3 -**

Error: Subreport could not be shown.

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Brian Bartos - CPS Energy - 3 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Joel Wise - Tennessee Valley Authority - 1,3,5,6 - SERC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Nick Vtyurin - Manitoba Hydro - 1,3,5,6 - MRO**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -**

Selected Answer: No

**Answer Comment:**

ERCOT reiterates its comments as set forth above. It also provides additional observations and comments below.

ERCOT disagrees with the review team's recommendation to retire Requirement R1.9 in the future. The transfer of operations and authority must be a coordinated, well-understood, well-established process. Without documentation of such process, there is a potential for error that could endanger the completion of restoration efforts and the resumption of normal operations.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Andrew Pusztai - American Transmission Company, LLC - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Molly Devine - IDACORP - Idaho Power Company - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Lee Pedowicz - NPCC - 10 - NPCC**

Error: Subreport could not be shown.

**Selected Answer:** No

**Answer Comment:**

Once R7 is retired and its language is incorporated into R1, the EOP PRT's recommendation under 2.c. becomes moot [Note: the EOP PRT should have included a similar recommendation for R8, but that recommendation also becomes moot once R8 is retired and its language is moved to R1 as described above].

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Mark Kenny - Northeast Utilities - 3 -**

Selected Answer: No

**Answer Comment:**

Once R7 is retired and its language is incorporated into R1, the EOP PRT's recommendation under 2.c. becomes moot [Note: the EOP PRT should have included a similar recommendation for R8, but that recommendation also becomes moot once R8 is retired and its language is moved to R1 as described above].

**Document Name:**

Likes: 0

Dislikes: 0

---

**Ben Engelby - ACES Power Marketing - 6 -**

Error: Subreport could not be shown.

Selected Answer: Yes

**Answer Comment:**

We agree that EOP-006-2 should be revised and requirements should be retired that meet Paragraph 81 criteria.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Kathleen Black - DTE Energy - 3,4,5 - RFC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Jason Smith - Southwest Power Pool, Inc. (RTO) - 2 - SPP**

Error: Subreport could not be shown.

Selected Answer: No

**Answer Comment:**  
See other comments.

**Document Name:**



**Likes:** 0

**Dislikes:** 0

---

**Jared Shakespeare - Peak Reliability - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Rachel Coyne - Texas Reliability Entity, Inc. - 10 -**

Selected Answer: No

**Answer Comment:**

Texas RE does not agree with the retirement of Requirement R9.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Ben Li - Independent Electricity System Operator - 2 - NPCC**

Error: Subreport could not be shown.

Selected Answer: Yes

**Answer Comment:**

**We generally agree with the proposed revisions except the proposed retirement of Requirement R9 as noted under Q2, above.**

**Also, once R7 is retired and its language is incorporated into R1, the EOP PRT's recommendation under 2.c. becomes moot [Note: the EOP PRT should have included a similar recommendation for R8, but that recommendation also becomes moot once R8 is retired and its language is moved to R1 as described above].**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 - SERC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Sergio Banuelos - Tri-State G and T Association, Inc. - 1,3,5 - MRO,WECC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Leo Staples - OGE Energy - Oklahoma Gas and Electric Co. - 5 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

Selected Answer: Yes

**Answer Comment:**

Please change to wording of the question to clearly indicate the framework of the question is the initial recommendation ***decision*** regarding reaffirm/revise/retire of a Standard

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**minh pham - Los Angeles Department of Water and Power - NA - Not Applicable - WECC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Joshua Andersen - Salt River Project - 1,3,5,6 - WECC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Daniela Hammons - CenterPoint Energy Houston Electric, LLC - 1 - TRE**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**5. If you have any other comments that you have not already mentioned above, on the Periodic Review recommendation, please state it specifically for EOP-006-2.**

**Dennis Minton - Florida Keys Electric Cooperative Assoc. - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Leonard Kula - Independent Electricity System Operator - 2 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Si Truc Phan - Hydro-Québec TransEnergie - 1 - NPCC**

Selected Answer:

**Answer Comment:**

R1: The phrase “or an energized island has been formed on the BES within the Reliability Coordinator Area” needs to be clarified. None of the sub-bullets elaborate on this particular point.

The spirit of this standard applies most notably to coordination between Reliability Coordinators and between the Reliability Coordinators and their Transmission Operators. Does the “energized island” refer to an island formed between two TOPs or an island formed within one TOP in the Reliability Area? Is the formation of the island in the context of a partial outage? In the Québec Reliability Area, islands are formed regularly albeit with neighbouring Reliability Areas.

Furthermore, R8 relates to resynchronizing islanded areas that bridge boundaries between TOPs or Reliability Coordinators (RC).

R1, R7 and R8 of EOP-005-2 make no reference to the formation of an island in the context of the TOP restoration plan.

R3 and R5: Hydro-Quebec TransEnergie assumes the role of both RC and TOP for the Quebec Interconnection. It would be helpful to consider this situation.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO**

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Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Kaleb Brimhall - Colorado Springs Utilities - 5 -**

Error: Subreport could not be shown.

Selected Answer:

**Answer Comment:**

No Comments

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Connie Lowe - Dominion - Dominion Resources, Inc. - 3 -**

Error: Subreport could not be shown.

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Brian Bartos - CPS Energy - 3 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Joel Wise - Tennessee Valley Authority - 1,3,5,6 - SERC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Nick Vtyurin - Manitoba Hydro - 1,3,5,6 - MRO**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Andrew Pusztai - American Transmission Company, LLC - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Molly Devine - IDACORP - Idaho Power Company - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Lee Pedowicz - NPCC - 10 - NPCC**

Error: Subreport could not be shown.

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Mark Kenny - Northeast Utilities - 3 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Ben Engelby - ACES Power Marketing - 6 -**

Error: Subreport could not be shown.

Selected Answer:

**Answer Comment:**

(1) There are many Regional Entities that have not audited EOP-006-2 because it was not listed on the AML in previous years. There is not yet industry consensus on what evidence will meet compliance with EOP-006-2. A guideline and technical basis section in the standard should be developed to provide this guidance to industry.

(2) We disagree with the recommendations to use the phrase “develop, maintain and implement,” because both R7 and R8 are implementation requirements. Development and maintenance requirements are contained in R1. Further, the recommended modifications to R7 do not include this phrase, which leads to confusion what exactly the review team is recommending.

(3) Thank you for the opportunity to comment.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Kathleen Black - DTE Energy - 3,4,5 - RFC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Jason Smith - Southwest Power Pool, Inc. (RTO) - 2 - SPP**

Error: Subreport could not be shown.

Selected Answer:

**Answer Comment:**

We would suggest to the review team to add a time frame for Requirement R4 pertaining to the Reliability Coordinator reviewing the neighboring Reliability Coordinator(s) restoration plan as done in Requirement R3. In our opinion, this would promote consistency on the reviewing of both sets of documentation.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Jared Shakespeare - Peak Reliability - 1 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Rachel Coyne - Texas Reliability Entity, Inc. - 10 -**

Selected Answer:

**Answer Comment:**

Texas RE recommends the future Standards Drafting Team review "Data Retention" section as it relates to the forward looking aspects of risk-based compliance activities. It appears that the Data Retention parameters for R3 (assume worse case of 39 months) go beyond the data retention requirements for R1 (assume "normal" 36 month review but if this is a risk identified to be monitored an RC could be audited on a more frequent basis than every three years). Similar statements could be made about several of the Data Retention items. The Data Retention for R10 could stretch to 6 years. Texas RE recommends the "Compliance Monitoring Process" section be consistent with other Standards being reviewed.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Ben Li - Independent Electricity System Operator - 2 - NPCC**

Error: Subreport could not be shown.

Selected Answer:



**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 - SERC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Sergio Banuelos - Tri-State G and T Association, Inc. - 1,3,5 - MRO,WECC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Leo Staples - OGE Energy - Oklahoma Gas and Electric Co. - 5 -**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

Selected Answer:

**Answer Comment:** None.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**minh pham - Los Angeles Department of Water and Power - NA - Not Applicable - WECC**

Selected Answer:

**Answer Comment:**

LADWP requests clarification on what a “unique task” will be defined as in the RSAW, maybe even add it to a future version of the NERC Glossary of Terms.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Joshua Andersen - Salt River Project - 1,3,5,6 - WECC**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Daniela Hammons - CenterPoint Energy Houston Electric, LLC - 1 - TRE**

Selected Answer:

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0